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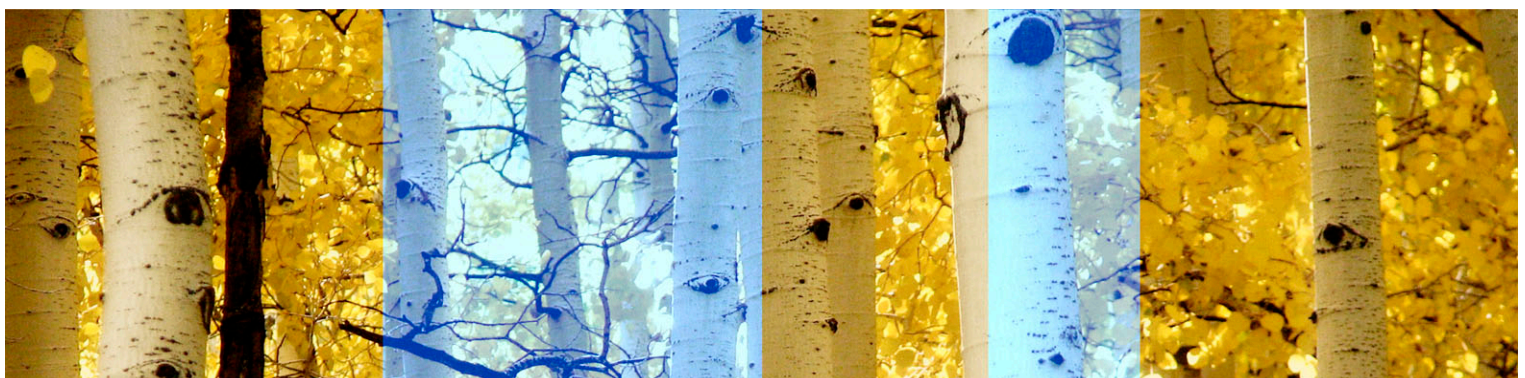
PEFC Council

## **Assessment of the Revised American Tree Farm System against the PEFC Council Requirements**

*Final Report v2*

Helsinki, Finland  
September 19, 2017

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ID 104179





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## ABBREVIATIONS

AFF	American Forest Foundation
AMG	Aggregated Management Groups
ANAB	ANSI-ASQ National Accreditation Board
ATFS	American Tree Farm System
BMP	Best Management Practices
CB	Certification Body
CFF	Center for Family Forestry
CoC	Chain of Custody
ENGO	Environmental Non-governmental organization
EPA	Environmental Protection Agency
FORI	Forests of Recognized Importance
GM	Genetically Modified
GMO	Genetically Modified Organism
I	Indicator
IAF	International Accreditation Forum
ILO	International Labor Organization
IMG	Independently Managed Group
ISO	International Organization for Standardization
ISRP	Independent Standards Review Panel
MLA	Multi-Lateral Agreement
MP	Management Practices
LLC	Limited Liability Company
NC	Non-conformity
NGB	National Governing Body
NGO	Non-governmental Organization
NSIC	National Standards Interpretation Committee
PEFC	Programme for the Endorsement of Forest Certification Schemes
PEFC GD	PEFC Guidance document
PEFC ST	PEFC Standard
PM	Performance Measures
SCC	Standards Council of Canada
SFI	Sustainable Forestry Initiative
SFM	Sustainable Forest Management
SOP	Standard Operating Procedures
ST	Standard
TFG	Task Force Group
TIMO	Timber Investment Management Organization
US	United States
USFS	United States Forest Service
WG	Working Group
WHO	World Health Organization



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## PREFACE

This report provides an independent conformity assessment on the revision of the American Tree Farm System with the requirements of PEFC Council. The report is prepared to provide information for the PEFC Council for its decision on re-endorsement of the American Forest Foundation (AFF) 2015-2020 Standards of Sustainability for Forest Certification (later on the Standards).

The report or its information may not be used for other purposes. PEFC Council has the right to publish the final version of the report on the PEFC Council's Internet site.

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## 1. INTRODUCTION

### 1.1 Objective and Scope of the Assessment

The American Tree Farm System (ATFS) or Scheme was established in 1941 to represent mainly family owned small wood lands in the United States. It is managed by the American Forest Foundation (AFF). Currently the ATFS includes 74 00 family forest owners managing over 20 million acres (8 million hectares) of forests. The ATFS was first endorsed by the PEFC Council in 2008. The Scheme revised the Standards between 2013 – 2014. The revised Standards were adopted by the AFF Board on November 12, 2014 and submitted for the PEFC Council re-endorsement in September 2016.

The objective of this conformity assessment is to verify the compliance of the revised Standards with the international PEFC requirements. The assessment will cover ATFS procedures and processes for standard setting, scheme implementation, certification arrangements and performance requirements for forest management.

The assessment report will provide sufficient information, professional and objective conclusions on the compliance of different scheme elements with PEFC requirements. The report will provide a basis for the decision-making process of the PEFC Council on possible re-endorsement of the revised ATFS.

### 1.2 Assessment Process

The assessment process included the following phases:

#### 1. International public consultation

The international public consultation, organized by the PEFC Council, was held in November 2016 – January 2017. No comments were received during the consultation.

#### 2. National consultation of interested parties

The objective of the consultation was to verify that the planned procedures were implemented and the principles of open access, fair decision making, consensus building and availability of grievance procedures were respected.

Indufor sent out a questionnaire on standard setting process to 13 parties, which had participated in the standard development. The AFF staff provided the original contact list for the parties. In addition, the AFF staff also contributed to distribution of the survey by sending it to the ATFS network of state committees and volunteers and the Forests & Family list embedded into their newsletter.

The questionnaire was sent out on January 25, 2017 and 6 replies have been received. A compilation of the comments received during the consultation is presented in Table 12.1 and more detailed replies to questions are available in Appendix 3.

#### 3. Desk study

The desk study on the ATFS normative documents was made against the PEFC requirements using the PEFC Checklist (PEFC IGD 1007-01:2012) as a reference template. Evidence on conformity was verified from the original ATFS documentation or another document or information source (e.g. website publication) referred to by the AFF.

#### 4. Elaboration of draft report

The draft report was sent to the PEFC Council on February 10, 2017 and then to the AFF. The draft report listed as non-complying all the PEFC requirements that lacked adequate evidence on conformity by the ATFS. In the draft report, the non-conformities were not classified into minor or major non-conformities.

The AFF provided comments and further information in its official response dated March 11, 2017. The Indufor team had the opportunity to discuss with Sarah Crow, Senior Director of



the ATFS during her visit to Helsinki on March 20, 2017. ATFS provided further explanations and evidences, e.g. minutes, on the issues with minor non-conformities or comments.

#### **5. Elaboration of the final draft report**

The clarifications and additional information and documents the AFF has provided on the non-conforming issues were taken into consideration when drawing the final conclusions in this final draft report.

The report was sent to the PEFC Council on June 8, 2017, and the PEFC Council has submitted it to the PEFC Panel of Experts for review.

#### **6. Review of the Panel of Experts**

The comments provided by the Panel of Experts to the final draft report in August 22, 2017 have been taken into consideration in this Final report and presented in Appendix 4 to the report.

#### **7. Elaboration of the final report**

The final report includes any changes and amendments that Indufor, in the role of the independent assessor, deems relevant to include in the report. Appendix 4 gives justifications for consideration of each one of the comments received from the Panel of Experts.

### **1.3 Report Structure**

Chapter 1 describes the objective and process of the independent assessment.

Chapter 2 will state the Indufor' s recommendation to the Board of the PEFC Council on the endorsement of the Standards and Rules.

Chapter 3 describes a summary of findings and gives justifications for the given recommendation.

Chapter 4 presents the assessment method and material used.

Chapter 5 describes the structure of the American Tree Farm System and the procedures for scheme revision. It also evaluates how the written procedures were implemented in the standard and rules development.

Chapter 6 assesses ATFS requirements for group certification and their compliance with the PEFC requirements.

Chapter 7 describes the requirements of the forest management standard in view of the PEFC requirements.

Chapter 8 describes the ATFS 2015-2020 arrangements for chain of custody standard certification and gives an opinion on possible revision requirements.

Chapter 9 address the ATFS regulations on the use of the PEFC logo.

Chapter 10 reviews the ATFS requirements for certification and accreditation procedures including notification of certification bodies.

Chapter 11 reviews procedures for appeals and dispute resolution and their application in practice.

Chapter 12 summarizes the received stakeholder comments and explains their consideration in the assessment.

Appendices provide detailed information on the assessment. The most relevant is Appendix 1 describing Indufor's conclusions on ATFS 2015-2020 conformity with each PEFC requirement and lists the reference documents that provide the basis for the conclusion.





## 2. RECOMMENDATION

The recommendation of Indufor is that PEFC Council re-endorses the revised American Tree Farm System (ATFS) designed to certify private woodlots in the North America, mainly in the US. ATFS documentation and standard requirements comply with the PEFC requirements apart from two minor non-conformities.

The minor non-conformities relate to invitation for standard revision and to ATFS policy towards genetic modification. Neither of the non-conformities risk the stakeholder participation in standard setting or compliance with PEFC forest management standards, but they are aspect that are addressed in PEFC rules but currently ignored in ATFS development. In addition, nine comments were raised to be considered in the future development of the Scheme.

### Minor non-conformity:

1. PEFC ST 1001:2010 requires that the announcement (for standard setting) shall include an invitation to comment the planned standard setting process.

The ATFS standard setting procedures or process overview do not provide an option for stakeholders to comment on the planned process and does not describe how the potential comments are addressed.

The standard setting procedures were publicly available but they should be amended to also address the possibilities of stakeholders to comment on the planned process before its launching.

2. PEFC ST 1003:2010 5.4.7 requires that genetically-modified trees shall not be used.

The Standards do not address the issue of genetic modification at all. Currently, the US regulations do not allow the release of genetically modified forest trees for commercial timber production. Small-scale landowners will not either be early adopters of modified trees once their use e.g. in landscaping or other forest use may become authorised. However, the AFF still needs to take a clear position on the use of genetically modified organisms (GMOs) and communicate it clearly.

### Comments:

#### Standard revision

1. PEFC ST 1001:2010 on standard setting requires that the invitation for the standard revision shall include information on objectives, scope, steps and time-table of the process.

The ATFS rules for standard setting do not specify that the information should be shared in the announcement of the revision process. However, during the process the information was readily shared. AFF should update the rules on standard setting procedures to include the required information to be shared in the process launching.

2. PEFC ST 1001:2010 5.3 a), d), and 5.4 require that the announcement shall include an invitation to stakeholders to nominate their representatives to the working group.

The invitation of stakeholders is limited to the parties invited by the AFF Board. Yet the AFF Board shall aim at a balanced representation and consideration of potential disadvantaged stakeholders. The AFF Board has set criteria for the representativeness of different interest in the working group which outlines the selection of stakeholders if needed.

The criteria to value the relevance of different interest groups in case there is a need to restrict the number of representatives, are now presented in an AFF board memo. Such information should be publicly available to interest groups.

In the future revisions, the public announcements on standard revision should clearly indicate how different interest groups have access to participate in drafting of the forest management standards in the standard setting working group.



### Forest management standard

3. PEFC ST 1003:2010 5.1.11 prohibits conversion of forests to other type of land use, including conversion of primary forests to tree plantations.

The Standards do not address conversion. The ATFS requires that certified area is forest and permanent removal of trees leads to exclusion from certification. In the US, primary forests are mostly protected by laws and located on public lands. Thus, it is justified that conversion of primary forests to plantations is less relevant in certification to ATFS which is applied by small woodland owners. In any case the Standards should make a reference to the applicable laws or control mechanisms regulating potential conversion.

4. PEFC ST 1003:2010 5.4.7 requires that ecological connectivity shall be promoted.

It is recognised that implementation of rules on ecological connectivity in private small-scale forestry is difficult and the Standards set requirements that are adaptable to the members' forests. Yet AFF should consider in future standard revisions, how to improve the connectivity.

5. PEFC ST 1003:2010 5.6.4 requires that 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 on the Rights of Indigenous Peoples.

The Standard does not address customary rights of local or indigenous people. However, certified landowners shall consider the cultural values of landscape level importance in forests classified as Forests of Recognized Importance (FORI).

The rights of indigenous people are well defined by legislation that require their consideration in public forests. In certified private forests, landowners must comply with potential measures identified through the FORI classification.

The standard requirements on indigenous peoples' rights are weak, but in the US, it is an issue that is mainly addressed in public forestry.

6. PEFC ST 1003:2010 5.6.5 requires that adequate public access to forests for recreation shall be provided taking into consideration relevant conditions.

Landowners' obligations to provide access to the recreational use of forests are voluntary and required only if they are in line with land owners' objectives. Applicable laws and norms on customary rights in private woodlots do not require public access and the Standards do not go beyond the legal requirements if land owner does not specifically wish so.

AFF should consider strengthening the requirements on public access or recreational use of forests in its future revisions.

### Group Certification

7. Group certificate on the conformity to *Independently Managed Group (IMG) Certification Standards*, verifies the conformity of group's administrative procedures and it does not directly require conformity to SFM standard. However, the procedures require the conformity and there are adequate monitoring measures to verify it. Thus, group certificate demonstrates indirectly that a member's forests are sustainably managed.

ATFS should better describe how group certificate provide evidence on SFM to improve communication and to ensure that PEFC labelling and claims based on IMG group certificate are correctly used.

### Certification and Accreditation

8. PEFC Annex 6 on Certification and Accreditation Procedures requires that the certification body for forest management certification shall fulfil requirements defined in ISO 17021.

In the ATFS the accreditation requirements are combined with the requirements of the certification scheme of the Sustainable Forestry Initiative (SFI) and they are specified in the



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accreditation rules of the two recognized national accreditation bodies (the ANSI-ASQ National Accreditation Board (ANAB) and the Standards Council of Canada (SCC)). The SCC rules and agreements on providing accreditation services for forest certification under ATFS, are outdated and make references to old standard documents. SCC is currently updating the rules. The rules of ANAB are updated and complying.

#### **Chain of Custody Certification**

9. Chain of custody certification against international PEFC standard (PEFC Annex 6, 3)

In chain of custody certification ATFS relies on SFI approved standards and procedures (2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9). These procedures refer to SFI chain of custody standard although for PEFC endorsement the applicable standard is the international PEFC ST 2002:2013.

AFF should be specific on the applicable chain of custody standard in ATFS documentation.



### **3. SUMMARY OF FINDINGS**

#### **3.1 General Scheme Structure**

The American Tree Farm System (hereafter the Scheme) is managed by the American Forest Foundation (AFF). It is a well-structured scheme for sustainable management of family owned small wood lands in the United States. ATFS has three components:

- Regional Groups
- Independent Managed Groups (IMGs) managed by private organizations and public agencies
- Individual Certified Properties.

The ATFS has adopted the PEFC international chain of custody standard (PEFC ST 2003:2012) and the related certification procedures are administered by the Sustainable Forestry Initiative (SFI), that is also the national PEFC governing body in the US. SFI is also responsible for maintaining logo use rules for the PEFC logo licensing. Based on a mutual service contract, it provides to AFF services on certification bodies' notification and PEFC logo licensing.

The ATFS requires that an independent third party accredited by a member of the International Accreditation Forum carries out certification audits.

#### **3.2 Standard Setting Procedures and Processes**

The ATFS standard setting rules set solid requirements for organization, administration and documentation, stakeholder participation and consensus building in a standardization process. The principles of participation and transparency guide the standard revision. The procedures are publicly available but currently they do not include a formal option to comment on the planned process before its launching.

The standard revision is done by an Independent Standards Review Panel (ISRP). The AFF Board invites stakeholders to ISRP in line with its obligation to aim at a balanced representation of different interests. The AFF Board is also responsible for adopting and approving the Standards. Other stakeholders have access for commenting on the draft standards, i.e. suggesting improvements and providing comments to preliminary and final drafts. The AFF sends out the draft standards to a very broad range of stakeholders. The AFF uses Internet, media (press releases) and email contacts to disseminate information on standard setting. The final versions of the Standards were posted on the ATFS website in January 2015.

The PEFC requirements for consensus-based decision-making apply both to the work of the ISRP and the AFF Board.

Complaints raised during the standard development or revision process are addressed to the AFF President and they are discussed by the AFF Board. Dispute and Appeals Procedures outline the steps in the process.

#### **3.3 Forest Management Standard**

The Standards address different aspects of forest management as presented in the eight standards with a number of performance requirements (PM) and indicators (I). The Standards are clearly written and auditable. They are well adapted to private smaller-scale management of woodlots and they set the requirements and provide guidance to improve performance.

The Standards cover different aspects of sustainable management of forests. However, they do not readily address the issues that are less relevant to small-scale landowners or that are regulated by legislation. These include prohibition for forest conversion, ban on the use of GMOs, recreational use of forests or respect of the rights of indigenous people. Although not applicable in traditional forest management on private woodlands, these PEFC requirements should be addressed in an appropriate way by the ATFS.



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The Standards require significant inputs from forest owners e.g. in forest management planning, monitoring, species protection and compliance with best management practices (BMPs) in soil and water protection. Some consultations with local people are also requested e.g. in species selection and in maintenance of aesthetic values of forests.

### **3.4 Certification and Accreditation Procedures**

ATFS certification shall be conducted by competent, impartial third-party auditors and bodies, that have an accreditation from a national accreditation body that is a member of International Accreditation Forum (IAF). The procedural requirements in certification comply with PEFC documents.

ATFS coordinates the development and implementation of certification and accreditation requirements with SFI. AFF has adopted the PEFC Certification and Accreditation document (Annex 6) and SFI accreditation requirements. It has agreed with two national accreditation bodies on the accreditation requirements for ATFS certification. The requirements are documented in the accreditation rules of ANAB and SCC. The SCC rules require updating before reaching a full compliance with PEFC requirements.

### **3.5 Complaints and Dispute Resolution Procedures**

ATFS has documented Dispute and Appeals Procedures. The AFF President is the contact point for any written complaints and allocates them to the AFF Board and relevant party for further discussion. The President collects the suggested solutions and communicates them to the complainant.

A special Task Force Group (TFG) is established by the President and the AFF Board's Executive Committee if the complaint requires further investigation.



## 4. MATERIAL AND METHODS

### 4.1 Notification of Certification Bodies

SFI notification procedures for certification bodies apply also in recognition of certification bodies within ATFS. The SFI notification procedures are recognized by PEFC Council as part of the SFI scheme endorsement.

### 4.2 PEFC Documentation

The following international PEFC standards and normative guidelines set the requirements for compliance for the American Tree Farm System. The assessment reviews in detail the conformity of the ATFS normative documents to specific PEFC requirement presented in the listed documentation.

#### Standard Setting

1. PEFC ST 1001:2010, Standard Setting – Requirements

#### Forest Management and Chain of Custody Requirements

2. PEFC ST 1003:2010, Sustainable Forest Management – Requirements
3. PEFC ST 2002:2013, Chain of Custody of Forest Based Products – Requirements

#### Implementation of Certification

4. PEFC ST 1002:2010, Group Forest Management Certification – Requirements
5. Procedures for complaints and dispute resolution: PEFC GD1004:2009, Administration of PEFC scheme, chapter 8

#### Requirements for Certification Bodies

6. Procedures for notification of certification bodies: PEFC GD1004:2009, Administration of PEFC scheme, chapter 5
7. Certification and accreditation procedures, as defined in the PEFC Council Technical Document, Annex 6 and
8. PEFC ST 2003:2012 (2<sup>nd</sup> edition of 2014), Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

#### PEFC Logo Usage

9. Procedures for logo licensing: PEFC GD1004:2009, Administration of PEFC scheme, chapter 6

#### Other Documentation

10. A stakeholder survey to verify stakeholder invitation and participation in standard revision along with stakeholder views on process implementation.

The *PEFC Standard and System Requirement Checklist* (PEFC IGD 1007-01:2012) provided a template for detailed assessment of conformity to specific PEFC requirements.



### 4.3 ATFS Documentation

The assessment was based on the following documentation of the ATFS (Table 4.1).

**Table 4.1 ATFS Documentation**

<b>Document</b>
<b>1. Standards</b>
AFF 2015-2020 Standards of Sustainability American Tree Farm System © Independently Managed Group (IMG) Certification Standards
<b>2. Administrative standards</b>
Standard Setting Procedures
<b>3. Requirements for Certification Bodies</b>
Accreditation rule 27 (ANAB) Service Agreement between the American Forest Foundation and the Standards Council of Canada (SCC)
<b>4. Procedures for Complaints and Inquiries</b>
Disputes and Appeals Procedures
<b>5. Supporting documents</b>
AFF Standards Guidance
Eligibility Requirements and Guidance for Certification
Standard Operating Procedures for Regional State Program Forest Owner Group Certification
ATFS Interpretation and Guidance

ATFS does not have a chain-of-custody standard – the SFI/PEFC CoC schemes apply when the ATFS wood is supplied as a raw material to a company possessing an SFI/PEFC CoC certificate. ATFS has also adopted the international PEFC Certification and Accreditation Procedures (Annex 6).

The normative ATFS documents define the required procedures for standard setting, forest management, regional group certification and the qualification requirements for certification bodies and procedures.

The descriptive and guiding documents provided by the ATFS as appendices (Table 4.2) describe the implemented processes in the standard development.



**Table 4.2 ATFS Descriptive and Other Documents (Appendices)**

Appendix number	Document
1	American Forest Foundation (AFF) 2015-2020 Standards of Sustainability for Forest Certification
2	Standard Setting Procedures
3	Pre-Revision Public Comment Period
4	Announcement of Public Comment Period 2, resulting Themes & Important Comments, Emails & Working Drafts
5	Independent Standards Review Panel, List of Members, Invitation to Participate, Standards Consensus Return Form
6	Dispute and Appeals Procedure
7	Independent Standard Review Panel Meeting Minutes and Correspondence
8	AFF Final Standards Press Release
9	AFF Standards Guidance
10	ATFS Independently Managed Group Requirements (IMG-01), Internal Monitoring Checklists for Managers and Group Members
11	Regional Group Public Summary Report
12	Eligibility Requirements and Guidance
13	Management Plan Template
14	Links to State BMPs
15	ANAB Accreditation Rule 27/Standards Council of Canada Accreditation
16	Sampling Design for Internal Audits of Regional Groups to the AFF Standard
17	Regional Group Certification Standard Operating Procedures (SOPs)
18	ATFS Interpretations and Guidance
19	Tree Farm Inspection Record (Form 004)
20	Memorandum of Understanding with Labor Organizations
21	Monthly PEFC Reports
22	Independent Certification Body Certificates (Regional Groups)
23	AFF Board of Directors Approval of Standards
24	Tree Farm Inspector Manual
25	Family Forest Owners Survey
26	2015 SFI, Inc. Services Agreement with ATFS as PEFC US NGB and Secretary

PEFC Checklist compiled by the AFF is used as a reference base to look for specific evidence from the documentation.

#### 4.4 Methods

The assessment is done as a desktop study based on (i) the documentation listed above, (ii) on the feedback received from the stakeholders and (iii) on the additional clarification provided by the AFF. Indufor sent a questionnaire on the standard setting process to 13 stakeholders that participated in the standard setting. The questionnaire is presented in Appendix 3. Six replies were received (46% reply rate).

This conformity assessment presents the consultant's conclusions on the conformity of the ATFS forest certification system to PEFC requirements. The conclusions are based on the available evidence. Conformity to the PEFC requirements would assure that the Scheme is developed in line with PEFC requirements and that it will operate in a consistent and reliable





way. The assessment covers Scheme development and provisions for scheme implementation as described in Table 4.3.

**Table 4.3 Assessed Elements and Core Issues**

Element	Core issues
Standard setting	<ul style="list-style-type: none"> <li>- Stakeholder participation</li> <li>- Transparency</li> <li>- Consensus building</li> <li>- Consistency in planned procedures and in their implementation</li> </ul>
Criteria for forest management (standard)	<ul style="list-style-type: none"> <li>- Performance requirements</li> <li>- Practical applicability of the criteria considering natural conditions, forest tenure, organizational and administrative structures</li> <li>- Auditability of compliance with the criteria</li> </ul>
Certification arrangements (individual)	<ul style="list-style-type: none"> <li>- Applicability and governance of planned arrangements</li> <li>- Reliability of arrangements to deliver full conformance to the scheme requirements</li> <li>- Methods to indicate certification status</li> </ul>
Certification and accreditation procedures	<ul style="list-style-type: none"> <li>- Requirements set for certification bodies and procedures: competence requirements, independence and impartiality</li> <li>- Applied procedures</li> <li>- Access for CBs to enter into the market</li> <li>- Compliance of scheme provisions with PEFC requirements</li> <li>- Availability of eligible accreditation body to provide the service</li> </ul>

The results and conclusions on the conformity analysis are presented in detail in Appendix 1 where ATFS compliance with each requirement of the PEFC Council Checklist is assessed. For standard setting, the assessment includes separate conclusions for procedures and applied processes, i.e. rules for standard setting and the processes implemented in standard setting in practice. Box 4.1 provides the following grading of conformity levels as used in the final draft report (Box 4.1).

**Box 4.1 Assessment Scales Used in Conformity Evaluation (final draft report)**

<p><b>Conformity</b></p> <p>A procedure described by the Scheme documentation fully meets the particular requirement of PEFC Council.</p> <p><b>Minor nonconformity</b></p> <p>A minor nonconformity does not violate the integrity of the certification Scheme, and is not a bar to endorsement. The assessor recommends appropriate corrective action. Generally, a minor nonconformity should be corrected within 6 months. The assessor may recommend a longer period where justified by particular circumstances.</p> <p><b>Major nonconformity</b></p> <p>A major nonconformity violates the integrity of the certification Scheme and has to be corrected before the endorsement of the Scheme.</p> <p><b>Comment</b></p> <p>A comment gives an explanation to the conclusion on conformity or points out an important issue related to the Scheme.</p> <p><b>NA</b> Not applicable.</p>
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Only a positive conclusion on the conformity is considered to comply with PEFC requirements. The ATFS requirements with minor or major non-conformities do not comply with the performance level the PEFC Council has set for endorsed Schemes.



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PEFC requirements were classified as not applicable e.g., if they address a scheme development phase that is not relevant for the ATFS (i.e., testing of revised standard or requirements for scheme revision or dispute resolution process in the case where no disputes have been raised during revision).

A comment is raised on scheme related issues that establish a justified gap in conformity to literal interpretation of PEFC requirements or deserve other consideration in implementation or in future revisions.

The conformity assessment process is described in Section 1.2.

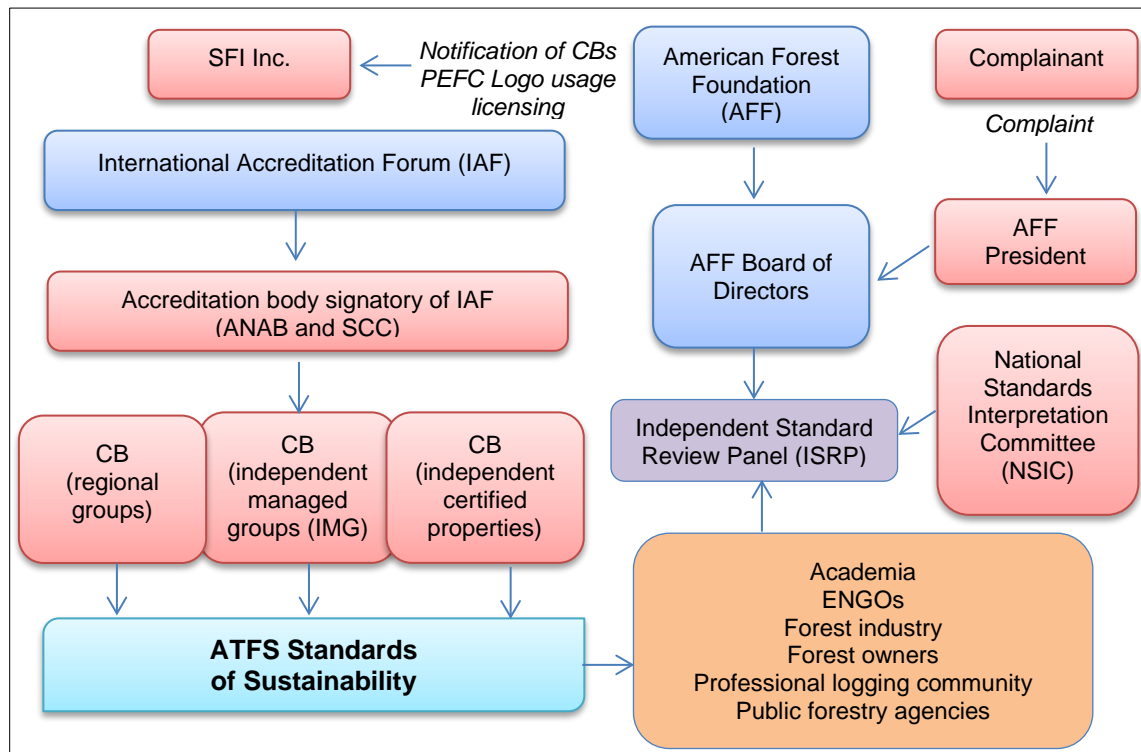


## 5. STRUCTURE OF THE AMERICAN TREE FARM SYSTEM

### 5.1 Scheme Organization

The American Forest Foundation (AFF) manages the American Tree Farm System (ATFS). Other scheme elements and functions are organized as presented in the Figure 5.1.

**Figure 5.1 Organization of the American Tree Farm System**



### 5.2 Standard Setting and Revision Procedures

The AFF Board approves ATFS standard setting and revision procedures. The procedures are available online at the AFF website.

According to the procedures, the standard development or revision starts with the AFF Board's invitation to selected interested parties to appoint their representatives to the Independent Standard Review Panel (ISRP). AFF provides public information on the beginning of the standard setting or revision process. The procedures specify that the ISRP shall have a balanced representation of interests and adopt its decisions based on a consensus. If a dispute emerges during the process, Disputes and Appeals Procedures will apply.

The ISRP gathers together and discusses standard modifications during at least two face-to-face meetings at the start and end of the process and may also organize conference calls or communicate using other means of communication. Once the ISRP reaches a consensus on the enquiry drafts, the Standards are published online for at least 60 days for the public consultation. After the second public comment period is over, the ISRP continues its work reviewing the Standards and deciding on adopting modifications. Once this stage is complete, the Standards are presented to the AFF Board for the final approval and adoption. Adopted standards are made publicly available by publishing them online.



### 5.3 Process Implementation

The standard setting process for the revision of the Standards is described in the ATFS document “Process overview schedule”.

#### 5.3.1 Standard Revision

The standard development was launched by the AFF Board in November 2013 when AFF conducted a stakeholder mapping exercise. The following key stakeholder groups were identified:

1. Conservation organizations
2. Forest workers
3. Foresters
4. Forest science and academia
5. Forest owners
6. Government agencies
7. Forest Industry
8. Buyers.

The selection of candidates was based on the following qualification criteria:

- a. Social, economic and ecological perspectives
- b. Gender
- c. Ethnic and cultural background
- d. Geographic diversity
- e. Underserved or resource limited communities (“disadvantaged stakeholders”).

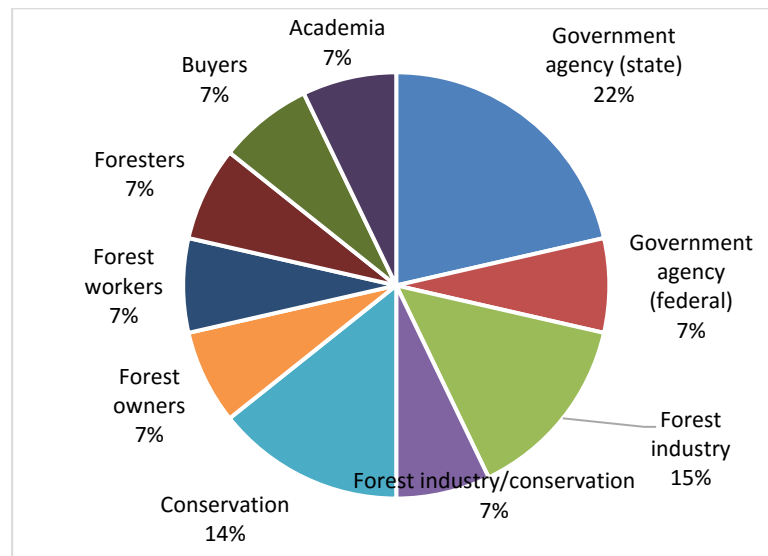
The ISRP, with 14 members was convened on January 7, 2014. The AFF did not inform and neither did the national stakeholder consultation record refusal of any member applications. The overall composition of the ISRP was rather balanced both regarding interests and the geographical scope (Figure 5.2).

A broad array of stakeholders was invited to comment on draft standards. An invitation was distributed in November 2014 through email lists compiled by the AFF comprising over 34 000 email addresses:

- AFF Corporate Newsletter (Corporate and other stakeholders)
- ATFS Forest and Families Newsletter (Certified Tree Farmers and other landowners)
- Inspectors (Foresters and other natural resource professionals)
- Tree Farm Committees (Volunteer leaders of state programs from diverse sectorial backgrounds/organizations)
- Week in Trees Newsletter (Subscribers that has self-identified as interested AFF’s work (ATFS and other programs), generally, or this broad-spectrum Newsletter)
- Media List (News outlets and reporters).



**Figure 5.2 Composition of the Independent Standard Review Panel**



A January (January 7, 2014) announcement also indicated the beginning of the first public comment period which lasted for 30 days until March 7, 2014. A public feedback session was also organized on February 18-20, 2014 at the ATFS National Leadership Conference in Savannah, Georgia. Comments were collected via the AFF website, online webinars, the public feedback session in Savannah, as well as in writing.

The ISRP held its first face-to-face meeting in Washington, DC in March 2014 in order to process the comments and begin development of the Standards. The second (enquiry) drafts were ready in May 2014 and were published for comment on June 1, 2014 for the period of 60 days (till August 1, 2014). In addition to the standard drafts, at this time Guidance and IMG Requirements were also made publicly available at the AFF website for comments.

Another public feedback session was organized in the middle of this process on July 17-19, 2014 at the ATFS National Tree Farmer Convention in Pittsburgh, Pennsylvania. After receiving the comments, the work of the ISRP continued throughout August and September and on October 1-2, 2014 the ISRP convened again in-person to finalize the Standards and submit them to the AFF Board. The ISRP members organized a ballot and signed personal consensus forms to demonstrate that the decision on approval of the final versions of the Standards was made in a consensus. No complaints were raised during the revision process.

On November 12, 2014, the Standards were formally adopted by the AFF Board and became effective on January 1, 2015. The transition period for the Standards lasted 1 year until the end of December 2015. The Standards became fully functional on January 1, 2016.

The AFF has record-keeping procedures in place: memos on meetings and teleconferences, summary of participatory process and feedback received during two public review and comment periods are published online at the AFF website.



## 6. GROUP CERTIFICATION ARRANGEMENTS

The ATFS recognizes group certification of forest owners at a regional level and at the level of Independent Managed Groups (IMGs). This assessment focuses on the IMG level of group certification and its requirements described in IMG Certification Standards. Regional certification has been excluded from the scope of the present assessment due to contradicting information regarding the number of groups (3 or 4) on the AFF's website and in the Standard Operating Procedures for Regional State Program Forest Owner Group Certification, as well as outdated status of the procedures (dated 2008).

IMG Certification Standards define the responsibilities and functions of the group organization and specifies different categories of group members, i.e. participants in group certification:

- Category 1 Group members retaining management authority on their property, e.g. individuals, family ownerships, limited liability companies (LLC) and other similar entities.
- Category 2 Group members that have delegated full management authority to the Group Manager, e.g. properties managed by a timber investment management organization (TIMO) and aggregated management groups (AMG).
- Category 3 Group members – government entities – retaining management authority or delegating it to the group manager, e.g. a local municipality, a public grade-school, a public university, a publicly-owned watershed authority, a tribal government, a state or federal agency.

The group organisation is responsible for compiling a list and maintaining a database of current and past members. Both the group organization and its members are required to have a written commitment to sustainable forestry demonstrating their compliance with the standards requirements. In addition, it is required that group members have an individual or a group management plan (for category 2).

Conformance of group members to the Standard is assessed and documented during internal monitoring as well as independent audits and identified non-conformities lead to mandatory corrective actions for the member. A group organization shall help its group members to carry out the corrective actions. Group organization's monitoring records are shared with AFF that files them to ATFS database.

A IMG group certificate verifies the conformity group's administrative procedures and it does not directly require conformity to SFM standard. However, the procedures require the conformity and there are adequate monitoring measures to verify it. Thus, group certificate demonstrates indirectly that a member's forests are sustainably managed.

The consultant recommends that ATFS better describes how group certificate provides evidence on SFM and also demonstrates that the PEFC labels and related claims are in line with the verified scope of a certificate.



## 7. FOREST MANAGEMENT STANDARD

### 7.1 General Remarks

The AFF 2015-2020 Standards of Sustainability (the Standards) incorporate eight standards on

1. Commitment to practicing in sustainable forestry
2. Compliance with laws
3. Reforestation and afforestation
4. Air, water and soil protection
5. Fish, wildlife, biodiversity and forest health
6. Forest aesthetics
7. Protect special sites
8. Forest product harvest and other activities.

Performance Measures (PM) and measurable Indicators (I) specify the requirements under each standard. The Standards are designed to accommodate the special characteristics of family and small to mid-sized woodlands. The Standards have compulsory core requirements (shall) and conditional requirements (should). The latter requirements are applied in a specific woodland as appropriate, based on professional judgement of forest managers and/or other experts in natural resource management or third-party assessments.

The Standards are clearly written, objective-based, and auditable. Guidance is provided for interpretation and application of each standard in different types of woodlands.

### 7.2 Analysis Results

AFF 2015-2020 Standards of Sustainability (Standards) address aspects of sustainable forest management and incorporate eight standards with various performance measures and indicators. The Standards are clearly written, objective-based, and auditable. They are described in detail, with additional guidance providing necessary level of information to understand the requirements on forest management unit level.

The Standards comply with PEFC requirements, apart from the absence of any direct commitment to not use GMOs in operational forest management in any conditions. Comments were raised on Standards related to forest conversion, maintenance of ecological connectivity, use of customary rights and public access to forests.

#### 7.2.1 Criterion 1 – Maintenance and Enhancement of Forest Resources and their Contribution to the Global Carbon Cycle

Standards 1-8 and rules for group certification establish requirements that comply with the PEFC ST 1003:2010 on maintenance and enhancement of forest resources. Standard 1 requires an active and adaptive forest management plan per woodland or per a certified group. The forest management plan shall be updated in line with monitoring results.

Forest management plans state the landowners' objectives for forest use that shall ensure long-term production capacity and sustainable management. In small-scale private forestry, the management plans do not state annual allowable cutting levels, but rather describe timber production potential in a more generic level.

The land owner is obliged to monitor harvesting and other management activities and he/she is encouraged to monitor any changes that could interfere with management objectives as stated in the forest management plan.

Land owners shall provide to interested parties' summary information of the forest management plan and audit report.

Forest conversion is not addressed in detail in the AFF standards. The scheme excludes any area that is converted from forest to non-forest use, and if it is done in conflict with land use zoning, etc., conversion can lead to dismissal of a certificate. Conversion of primary forest to



plantations is not either specifically defined. The ATFS prohibits conversion of forests of recognized importance (FORI) that include most often any primary forest on a woodland. In the US primary forests are mostly protected by laws and regulations and are located on public lands. Also timber notification law requires that woodland owners inform authorities on planned harvesting activities which strengthens the enforcement regulations related to conversion.

As a comment, the ATFS is requested to include appropriate references to relevant federal land use rules that regulate forest conversion. Also, the inclusion of ATFS general principles for certifiable forests in the standard requirement on conversion would clearly communicate the ATFS intent. The amendments should be taken into consideration in the next scheduled standard revision. Currently, the national, state level and local regulations on land use zoning set the conditions for conversion.

The Standards comply with the PEFC requirements on maintenance and enhancement of forest resources. Detailed conformance analysis between the Standards and the PEFC requirements are presented in the Appendix 1 p. 32-37.

#### **7.2.2 Criterion 2 – Maintenance of Forest Ecosystem Health and Vitality**

The forest management plan shall consider forest health and describe management activities related to it. Forest owners are encouraged to make practical efforts to improve forest health and to mitigate potential adverse impacts. Federal level pest monitoring (biotic stress inspection) is a national level monitoring system. The US Forest Service, State Fire Agencies and National Interagency Coordination Center monitor forest fires and produce maps on active wildfires.

The Standards require integrated pest management and evaluation of alternatives for pesticide use. Legislative control on pesticide use is consistent and highly toxic pesticides shall not be used in forestry.

ATFS certified forest owners shall meet or exceed state forestry best management practices (BMP) that, among other matters, set requirements on soil and water protection measures in forestry and road construction. Fertilizer use is controlled by national and state legislation and BMPs.

The Standards comply with the PEFC requirements on maintenance of health and vitality of forests. Detailed conformance analysis between the Standards and the PEFC requirements are presented in the Appendix 1 p 37 – 40.

#### **7.2.3 Criterion 3 – Maintenance and Encouragement of Productive Functions of Forests**

The standards require management that is in line with the land owners' objectives to maintain the potential of the property to produce forest products, including wood, fiber and non-timber products. The requirements to describe sustainable harvesting levels are general in nature and do not require quantified estimates for wood or other products. Thus, the Standards are adaptable also to small-scale woodlands but still require maintenance of the production capacity e.g., prompt regeneration.

The Standards comply with the PEFC requirements on productive functions of the forests. Detailed conformance analysis between the Standards and the PEFC requirements are presented in the Appendix 1 p. 40-42.

#### **7.2.4 Criterion 4 – Enhancement of Biological Diversity**

Mapping and safeguarding of habitats with threatened species and forests with special importance (FORI) are the standard requirements. In regeneration and afforestation forest owners shall use, whenever appropriate, native species and local provenances that are well adapted to local conditions. The Standards require that suitable regeneration methods are used but they do not set any preference to natural regeneration or planting.





As applied in small-scale private woodlands, the Standards do not set specific requirements to improve ecological connectivity. Buffer zones are requested to protect threatened species. At landscape level, state reforestation laws address ecological connectivity which has implications also for harvesting in private forests. Also, state level BMPs on water bodies often require buffer zones.

The fact that the Standards set minimal requirements related to connectivity is raised as a comment to consider in the future revisions. In private forestry connectivity is a difficult requirement to implement in practice.

The Standards do not take a position towards the use of genetically modified organisms (GMO). Forest management shall comply with laws and regulations that currently do not allow commercial release of GMOs in forest trees. Although the research e.g. on drought and disease resistant trees is well advanced, small-scale forest owners are unlikely to be in the forefront in testing of the new trees. However, the ATFS should take a clear position on the use of GMOs in line with the PEFC policy on the issue.

The Standards comply with the PEFC requirements on maintenance and enhancement of biological diversity apart from a **minor non-conformity** related to the absence of the ban on genetically modified organisms. Detailed conformance analysis between the Standards and the PEFC requirements are presented in the Appendix 1 p.42-46.

#### 7.2.5 Criterion 5 - Enhancement of Protective Functions in Forest Management

Standard 7 requires consideration and maintenance of special sites as well as reasonable efforts to locate and protect the sites that include areas sensitive to soil erosion or disturbances to water ecosystems. Standard 4 requires full compliance with relevant state level BMPs that set the benchmark for good conduct in soil and water protection especially in harvesting and road construction operations or management of hazardous chemicals that increase risk for environmental damages. BMPs are most often developed by the State Forest Service in cooperation with industry and other stakeholders. They are a combination of regulatory and voluntary measures designed to protect e.g., water quality on timber harvests. They outline the key principles in soil and water protection for a state and provide detailed guidance on how to mitigate any risks. The State Forest Service and participating partners usually provide training on the implementation of the BMPs in practice.

The Standards comply with the PEFC requirements on enhancement of protective functions. Detailed conformance analysis between the Standards and the PEFC requirements are presented in the Appendix 1 p.46-47.

#### 7.2.6 Criterion 6 - Maintenance of Socio-economic Functions

The Standards are based on the US laws and regulations in terms of maintenance of socio-economic functions in certified forests. The Standards require a commitment from landowner towards certified management that promotes among other social benefits from forests. Property rights are well defined in laws and regulations in the country, however, the obligations to recognize customary rights for forest use are lean on private woodlands.

The US government has not ratified ILO Conventions apart from the Convention 105 on Forced Labor (Table 7.1). According to a professional legal assessment of 2005 on the compliance of the US labor legislation and the listed ILO Conventions conducted by an independent US lawyer, the US federal level legislation prohibit forced and child labor, guarantee freedom of association, right to organize, collective bargaining (with some limitations) and equal remuneration. The assessment was requested by forestry sector organisations when preparing for standard revisions and previous endorsement rounds. Indufor has had the possibility to read the document but it is not openly accessible.



**Table 7.1 Ratification Status of Selected ILO Conventions in North America**

<b>ILO Conventions</b>	<b>Name and Year</b>	<b>Status in USA</b>	<b>Status in Canada</b>
ILO No 29	Forced Labor, 1930	not ratified	13 Jun 2011
ILO No 87	Freedom of Association and Protection of the Right to Organize, 1948	not ratified	23 Mar 1972
ILO No 98	Right to Organize and Collective Bargaining, 1949	not ratified	not ratified
ILO No 100	Equal Remuneration, 1951	not ratified	16 Nov 1972
ILO No 105	Abolition of Forced Labor, 1957	25 Sep 1991	14 Jul 1959
ILO No 111	Discrimination (Employment and Occupation) 1958	not ratified	26 Nov 1964
ILO No 138	Minimum Age for Admission to Employment, 1973	not ratified	
ILO No 182	Worst Forms of Child Labor Convention, 1999	not ratified	06 Jun 2000
<b>Other ILO Conventions referred by PEFC Council</b>			
ILO No 155	Occupational Safety and Health Convention, 1981	not ratified	not ratified
ILO No 169	Indigenous and Tribal People's Convention, 1989	not ratified	not ratified

- Sources:  
[http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200\\_COUNTRY\\_ID:102582](http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102582)  
[http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200\\_COUNTRY\\_ID:102871](http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102871)

The rights of indigenous people are defined by legislation and applicable mostly to public forests in the US. ATFS certified forest owners shall recognize the landscape level forests of recognized importance (FORI), that may also include cultural values. However, the Standards do not define in a sufficient way the recognition of customary rights, public access and recreational use in private forests. These issues are raised as comments.

The Standards require consultation with local people on species and on aesthetic values when appropriate. Regarding training and competence of forest workers, the Standards require that forest owners contract only trained and competent contractors. The requirement to implement relevant BMPs for forest work implies that forest workers must have received training on their implementation in practice.

The Standards comply with the PEFC requirements on maintenance of other socio-economic functions and conditions in forests. Detailed conformance analysis between the Standards and the PEFC requirements are presented in the Appendix 1 p.47-53.

**7.2.7 Criterion 7 - Legal Compliance**

The Standards require that landowners shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities. The compliance requirement also applies to contractors. In addition, land owners shall monitor harvest and other management activities and they are encouraged to record all monitoring information in case of any risk for non-complying activities.

The Standards comply with the PEFC requirements on legal compliance. Detailed conformance analysis between the Standards and the PEFC requirements are presented in the Appendix 1 p.53-54.



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## **8. CHAIN OF CUSTODY CERTIFICATION**

The American Tree Farm System does not have a scheme specific chain-of-custody standard. In the chain of custody certification, the ATFS relies on the SFI certification procedures and international PEFC standard PEFC ST 2002:2013 on Chain of Custody of Forest Based Products. For details on conformance of chain of custody certification with PEFC requirement, refer to section 10.1.

## **9. PEFC LOGO USAGE**

ATFS has adopted the international PEFC standard for logo licensing (PEFC ST 2001:2008). It does not have a scheme-specific standard on the logo usage.

The control of ATFS and/or PEFC logo use is carried out by certification bodies as defined in the Accreditation Rule of ANAB and SCC (Table 4.2, Appendix 15). In addition, according to the service agreement between the SFI Inc. and the ATFS – Appendix 26 Section C – it is the responsibility of the SFI Inc. to manage the general use of the PEFC Logo in the US, including issuing license agreements, generating logo ID, providing logo use guidelines, and maintaining a database with logo users.



## **10. CERTIFICATION AND ACCREDITATION PROCEDURES**

### **10.1 ATFS Requirements for Certification and Accreditation**

AFF has adopted the international PEFC Certification and Accreditation Procedures (Annex 6) to the generic ATFS standard on accreditation and certification. ATFS also relies on the standards of the Sustainable Forestry Initiative (SFI) in its accreditation requirements and cooperation with accreditation and certification bodies.

The accreditation bodies recognized by the ATFS are the ANSI-ASQ National Accreditation Board (ANAB) in the US and the Standards Council of Canada (SCC) in Canada. They are both members of the International Accreditation Forum (IAF) and signatories to its Multilateral Agreement (MLA). The operational accreditation rules are recorded in procedural requirements of the two accreditation bodies.

The rules of the two accreditation bodies, ANAB Accreditation Rule 27 and SCC Agreement with AFF specify the requirements for certification bodies and certification processes in individual and group certifications. The SCC is in the process of updating its accreditation rules and the agreement with AFF which is raised as a comment. The current documentation still refers to old versions of SFI standards on accreditation. The rules of ANAB on accreditation of forest management certification bodies are fully complying with the PEFC requirements.

Both accreditation rules require compliance to the ISO 17021 standard for certification bodies accredited to carry out forest management certification in line with the ATFS standards.

In chain of custody certification, the ATFS rules also refer to 2015-2019 SFI approved standard on Audit Procedures & Auditor Qualifications and Accreditation (SFI Section 9). SFI has its own chain of custody standard and label that are not relevant in PEFC recognized ATFS certification. A comment is raised that ATFS shall specify the applicable standards in chain of custody certification. Because the ATFS does not have a scheme specific standard, it shall apply the international PEFC ST 2002:2013. SFI rules on accreditation, certification and PEFC labelling apply in chain of custody certification under the ATFS.

Despite of the comments on updating of SCC accreditation rules and specification of chain of custody standard in the ATFS, the system requirements for certification and accreditation are compliant to PEFC requirements.

Detailed conformance analysis between the AFF Rules on accreditation (Appendix 15 to the ATFS documentation) and PEFC requirements are presented in the Appendix 1 p.55-61.

### **10.2 Notification of Certification Bodies**

SFI is the national PEFC Governing Body in the US. Notification of certification bodies is the responsibility of the SFI Inc. as determined in Appendix 26 "2015 SFI Inc. services agreement with ATFS as PEFC US National Governing Body and Secretary". AFF is also committed to follow the PEFC notification rules as defined in Annex 6 to the PEFC Technical Documentation.

The SFI notification rules are not publicly available, but in the endorsement assessment of SFI scheme in 2016 they were reviewed by the PEFC appointed consultant or assessor and considered compliant with the PEFC requirements.



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## **11. COMPLAINTS AND DISPUTE PROCEDURES**

Disputes and Appeals Procedures (Table 4.2, Appendix 6) present a well-defined written procedure for dealing with complaints connected to standard setting and other issues relating to AFF. All complaints/appeals shall be made in writing in the name of the AFF President who oversees acknowledging their receipt or rejecting them and providing information on the decisions to the complainant. If the complaint is related to the Center for Family Forestry (CFF) state committee, ISRP or National Standards Interpretation Committee (NSIC), the body that the complaint relates to shall (within a period of 30 days) deal with the complaint and provide a report to the AFF President.

If there is no possibility of resolving the complaint, the President and the AFF Board Executive Committee shall appoint a Task Force Group (TFG) which shall investigate the issue (typically within 1 month if no on-site visits are required). Upon concluding the investigation and resolving the issue, the TFG shall provide the AFF Board with a written report for approval. The AFF President bears the responsibility for notifying the complainant of the results of the resolution process. Resolution of appeals follows a similar process.



## 12. STAKEHOLDER SURVEYS

### 12.1 International PEFC Consultation

The international public consultation organized by the PEFC Council was held in November 2016 – January 2017. No comments were received during the consultation.

### 12.2 Stakeholder Questionnaire

Indufor sent out a questionnaire on the standard setting process to 13 parties that included parties, which had participated in the standard development. The questionnaire was sent by email and the AFF provided contact details. The questionnaire was sent out on January 25, 2017 and respondents had over two weeks to reply to the questionnaire. 6 replies have been received – 1 from universities, 1 from forest industry representatives, 1 from environmental NGOs, 2 from forest owners/managers and 1 from other governmental organizations. In addition, the AFF staff have also contributed to distribution of the survey by sending it to the ATFS network of state committees and volunteers and the Forests & Family list embedded into their newsletter. The summary of received comments is presented in Table 12.1.

**Table 12.1 Summary of Comments of Stakeholder Consultation**

Replying interest groups	Commented issues
University Forest and timber industry ENGO Forest owner/manager/consultant Government	<p>The views on participation were in general positive with an impression of free access to participate. However, two participants were not sure of outreach to disadvantaged parties, e.g. tribal groups or other socially disadvantaged groups.</p> <p>The general opinion was that stakeholders of the standard setting groups represented different interests and had been provided sufficient opportunities for participation in the revision process. Opinions have been considered in a fair manner and decisions made in a consensus. Procedures were well communicated and drafts and other materials were distributed among participants. Nevertheless, some participants were not aware of dispute settlement procedures in case of conflicting views.</p>



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## Appendix 1

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### **Indufor Assessment on the ATFS Conformity with PEFC Checklist (PEFC IGD 1007-01:2012)**

Indufor Assessment of the Revised American Tree Farm System against the PEFC Council Requirements

PEFC Standard and System Requirement Checklist for the PEFC Council Re-endorsement in 2017



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**Purpose:**

- The assessment presented in this Appendix 1 reviews the compliance of the American Tree Farm System (ATFS) with all PEFC Council requirements for endorsed forest certification schemes.

**Explanations:**

- The conclusion on conformity with the PEFC requirements is presented in the column YES/NO. YES is indication for a full conformity and NO indicates that the evidence provided by the applicant is not adequate to make a conclusion on a full conformity.
- Non-conformities are classified as minor and major.
- Justification for the conclusion on conformity is provided under the column "Comment" in a form of an extract from a scheme document (*in italic*) and/or in an assessor's explanation.
- Assessor's **Comments** described in in the last column raise issues that shall be taken into consideration in the ATFS implementation or future improvement, but they do not reach a level of a non-conformity.

**Part I: Standard and System Requirement Checklist for standard setting (PEFC ST 1001:2010)**

Referred ATFS documents

<p>ATFS Standard revision procedures and process</p>	<p>Appendix 2 Standard Setting Procedures  <a href="https://www.treefarmssystem.org/stuff/contentmgr/files/2/4d57ff904f6c30951f4c3aab4d36455c/miscdocs/standardsettingprocedures.pdf">https://www.treefarmssystem.org/stuff/contentmgr/files/2/4d57ff904f6c30951f4c3aab4d36455c/miscdocs/standardsettingprocedures.pdf</a>  <a href="https://www.treefarmssystem.org/standards-process-overview">https://www.treefarmssystem.org/standards-process-overview</a>                      Appendix 2 Board of Directors, ISRP Memo 2013                      Appendix 2 Process Overview Schedule</p> <p>Appendix 4 AFF Certification Committee Meeting                      Appendix 5 Independent Standards Review Panel ISRP members list                      Appendix 5 Invitation to comment draft standard                      Appendix 5 Consensus Forms                      Appendix 7 Minutes of the AFF ISRP September 2014                      Appendix 7 Public Feedback                      Appendix 8 Press Release January 1, 2015                      Appendix 23 AFF Board Approval Minutes</p>
<p>Dispute settlement procedures</p>	<p>Appendix 6: American Forest Foundation Disputes and Appeals Procedures                      The procedures are available online at  <a href="https://www.treefarmssystem.org/stuff/contentmgr/files/1/e7b9cbf9378453d7f33a13c192b7e383/pdf/final_disputeresolutionprocess.110911.pdf">https://www.treefarmssystem.org/stuff/contentmgr/files/1/e7b9cbf9378453d7f33a13c192b7e383/pdf/final_disputeresolutionprocess.110911.pdf</a></p>

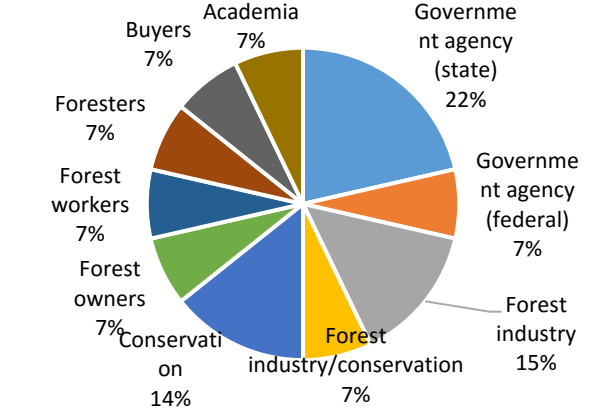
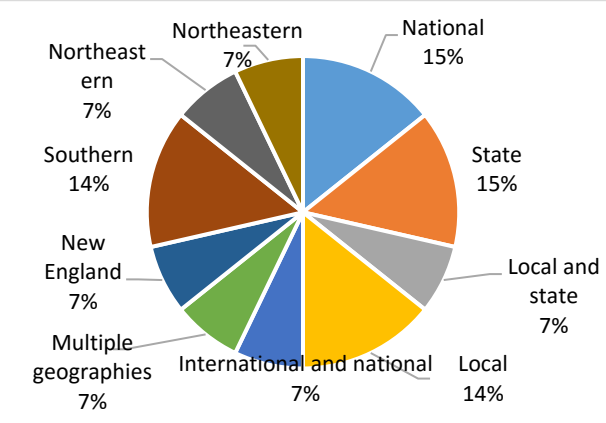
Requirement	Assessment basis	YES /NO*	Comment
<b>Standardising Body</b>			
4.1	The standardising body shall have written procedures for standard-setting activities describing:		

Requirement	Assessment basis	YES /NO*	Comment
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	YES	Appendix 2 “Standard setting procedures” contains written procedures. The document names the American Forest Foundation (AFF) as the body responsible for setting standards and the AFF Board as the body responsible for adopting standards and approving the definition of a consensus. In addition, the document underlines the use of a consensus-based approach in the Independent Standard Review Panel’s (ISRP) decision-making.
b) the record-keeping procedures,	Procedures	YES	Chapter 6 of Appendix 2 “Standard setting procedures” specify that the AFF shall keep all “ <i>records, minutes, communications and other pertinent and tangible evidence of the Standard revision/modification process</i> ”.
c) the procedures for balanced representation of stakeholders,	Procedures	YES	Chapter 2 of Appendix 2 “Standard setting procedures” states that Independent Standard Review Panel’s (ISRP) composition should have a balance among different stakeholders so that no single group dominates in decision-making. The Chapter lists various categories of stakeholders, including “ <i>academia, environmental non-government organizations (ENGOs), forest industry, forest owners, professional logging community, and public forestry agencies serving family forest owners</i> ”.
d) the standard-setting process,	Procedures	YES	Appendix 2 “Standard setting procedures” contains a complete description of the steps in the standard-setting process.
e) the mechanism for reaching consensus, and	Procedures	YES	Chapter 2 of Appendix 2 “Standard setting procedures” contains the mechanism for reaching a consensus – determining whether there are any opposing views – by organising a verbal vote, a vote by showing a hand or a “secret ballot” for voting yes or no, a written response indicating opposing or supporting views.
f) Revision of standards/normative documents.	Procedures	YES	Appendix 2 “Standard setting procedures” applies both to standard setting and revision. The Standards are to be revised no later than 4 years following the “ <i>field implementation</i> ” of the previous revision.
4.2 The standardising body shall make its standard-setting procedures publicly available and shall regularly review its	Procedures	YES	The intro of Appendix 2 “Standard setting procedures” points out that standard-setting procedures are available on the AFF’s website as well as on request from the AFF.

Requirement	Assessment basis	YES /NO*	Comment
standard-setting procedures including consideration of comments from stakeholders.	Process	YES	Standard setting procedures are available online at <a href="https://www.treefarmssystem.org/stuff/contentmgr/files/2/4d57ff904f6c30951f4c3aab4d36455c/miscdocs/standardsettingprocedures.pdf">https://www.treefarmssystem.org/stuff/contentmgr/files/2/4d57ff904f6c30951f4c3aab4d36455c/miscdocs/standardsettingprocedures.pdf</a> The procedures were last amended in January 2007. The Certification Committee reviewed the procedures in August 2013 in Seattle and decided to leave them without modifications.
4.3 The standardising body shall <u>keep records</u> 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 <u>be kept for a minimum of five years and shall be available</u> to interested parties upon request.	Procedures	YES	Chapter 6 of Appendix 2 "Standard setting procedures" states that the AFF shall keep all " <i>records, minutes, communications and other pertinent and tangible evidence of the Standard revision/modification process</i> ". The records are to be kept for not less than 5 and no more than 7 years and shall be available on the request.
	Process	YES	Appendix 7 presents minutes of the AFF ISRP teleconference meeting on September 26, 2014, a memo/email to the AFF Board dated June 17, 2014 describing the revision process, as well as a summary of comments received during two public review periods. The standard setting process overview is also available at <a href="https://www.treefarmssystem.org/standards-process-overview">https://www.treefarmssystem.org/standards-process-overview</a> ISRP meeting summaries, as well as the summary of engagement process and feedback received were made available at the AFF website
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	Procedures	YES	Appendix 2 "Standard setting procedures", Chapter 1 explains that the AFF Board shall establish an Independent Standard Review Panel (ISRP) responsible for standard-setting activities.
	Process	YES	According to Appendix 2 "Process overview schedule" the ISRP was convened by the AFF Board on November 12, 2013 and 14 members were announced on January 7, 2014.

Requirement	Assessment basis	YES /NO*	Comment
4.4 The working group/committee shall:			
a) be accessible to materially and directly affected stakeholders,	Procedures	YES	Chapter 2 of Appendix 2 “Standard setting procedures” lists various categories of stakeholders which may form the ISRP, including “ <i>academia, environmental non-government organizations (ENGOS), forest industry, forest owners, professional logging community, and public forestry agencies serving family forest owners</i> ”. The BOD is responsible for inviting a “ <i>cross-section</i> ” of stakeholders and interested parties to participate in the standard revision using various media sources. Chapter 1 underlines that those parties that are interested in participation, but cannot as the result of lacking financing and resources, may pass their comments through other ISRP members or during the public comment period.
	Process	YES	<p>According to the AFF, various stakeholders have been invited to participate in the process via emails, personal contacts and through webinars (e.g. Q4 2013 state leadership webinar December 11, 2013), events, press releases (e.g. leadership update December 13, 2013).</p> <p>AFF has several email lists – altogether 34 106 email addresses – through which the invitation for participation in the standard review process were sent:</p> <ul style="list-style-type: none"> <li>• AFF Corporate Newsletter (Corporate and other stakeholders)</li> <li>• ATFS Forest and Families Newsletter (Certified Tree Farmers and other landowners)</li> <li>• Inspectors (Foresters and other natural resource professionals)</li> <li>• Tree Farm Committees (Volunteer leaders of state programs from diverse sectorial backgrounds/organizations)</li> <li>• Week in Trees Newsletter (Subscribers that has self-identified as interested AFF’s work (ATFS and other programs), generally, or this broad spectrum Newsletter)</li> <li>• Media List (News outlets and reporters).</li> </ul> <p>According to Appendix 2 “BOD ISRP Memo 2013 A” based on the results of the stakeholder mapping exercise the following key stakeholder groups were identified:</p>

Requirement	Assessment basis	YES /NO*	Comment
			<ol style="list-style-type: none"> <li>1. Conservation organizations</li> <li>2. Forest workers</li> <li>3. Foresters</li> <li>4. Forest science and academia</li> <li>5. Forest owners</li> <li>6. Government agencies</li> <li>7. Forest Industry</li> <li>8. Buyers</li> </ol> <p>The representativeness of candidates was assessed based on the following:</p> <ol style="list-style-type: none"> <li>1. Social, economic and ecological perspectives</li> <li>2. Gender</li> <li>3. Ethnic and cultural background</li> <li>4. Geographic diversity</li> <li>5. Underserved or resource limited communities</li> </ol>
b) 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, and	Procedures	<b>YES</b>	Chapter 2 of Appendix 2 "Standard setting procedures" states that the ISRP shall reach a balance among different stakeholders so that no single group prevails in making decisions. The Chapter lists various categories of stakeholders (see PEFC requirement 4.4. a).
	Process	<b>YES</b>	Appendix 5 "ISRP members list". 14 members provided a balanced representation of different stakeholder categories and the geographical scope: 3 members representing state governmental agencies, 2- forest industry, 2- conservation, and each of 7 other categories were represented by 1 member.

Requirement	Assessment basis	YES /NO*	Comment
			 <p>2 members representing national, 2-state, 2-local, 2-southern regions, while the rest of 6 members represented other regions.</p> 




Requirement	Assessment basis	YES /NO*	Comment
c) 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	YES	Chapter 2 of Appendix 2 "Standard setting procedures" lists various categories of stakeholders (see PEFC requirement 4.4. a) for details). Materially affected stakeholders (industry, indigenous people, some NGOs) represent a large segment of these categories.
	Process	YES	Appendix 5 "ISRP members list". ISRP included 14 members with the relevant expertise which are in a position to influence implementation of the Standards. Materially affected stakeholders have represented a relatively large segment of participants (e.g. industry – Weyerhaeuser, New Page Corporation; indigenous people- Navajo Nation, some NGOs – EDF, Nisqually Land Trust, forest owners – Clint Bentz etc.)
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	YES	Appendix 6 "American Forest Foundation Disputes and Appeals Procedures" establishes procedures for dealing with complaints and appeals. The procedures are available online at <a href="https://www.treefarmssystem.org/stuff/contentmgr/files/1/e7b9cbf9378453d7f33a13c192b7e383/pdf/final_disputeresolutionprocess.110911.pdf">https://www.treefarmssystem.org/stuff/contentmgr/files/1/e7b9cbf9378453d7f33a13c192b7e383/pdf/final_disputeresolutionprocess.110911.pdf</a>
	Process	NA	No disputes or complaints have been received neither recorded
4.5 Upon receipt of the complaint, the standard-setting body shall:			
a) acknowledge receipt of the complaint to the complainant,	Procedures	YES	Chapter 6.3, Appendix 6 "American Forest Foundation Disputes and Appeals Procedures" states that: "6.3) <i>The President shall without delay: a) Acknowledge to the complainant / appellant (in writing) the receipt and subject of the complaint/appeal or rejection of the complaint/appeal with justification if it is not in accordance with clause 4.1, 4.2 or 4.3 (in case of the complaint) or 5.1 (in case of the appeal)</i> ".
	Process	NA	No complaints have been received
b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject	Procedures	YES	As described in Chapters 6 and 7 of Appendix 6 "American Forest Foundation Disputes and Appeals Procedures" the AFF President gathers and verifies

Requirement	Assessment basis	YES /NO*	Comment
matter of the complaint, and make a decision upon the complaint, and			information validating the complaint by requesting a report from the CFF state committee, ISRP or NSIC (in case the complaint relates to these bodies) or from the Task Force Group (TFG). The AFF Board is responsible for making a ruling on the complaint.
	Process	NA	No complaints have been received
c) Formally communicate the decision on the complaint and of the complaint handling process to the complainant.	Procedures	YES	According to Chapters 6 and 7 of the Appendix 6 "American Forest Foundation Disputes and Appeals Procedures" it is the responsibility of the President to "inform the complainant and other interested parties about the outcomes of the complaint resolution process in writing and sent through registered mail".
	Process	NA	No complaints have been received
4.6 The standardising body shall establish at least one <u>contact point for enquiries and complaints</u> relating to its standard-setting activities. The contact point shall be made easily available.	Procedures	YES	Chapters 6, Appendix 6 "American Forest Foundation Disputes and Appeals Procedures" specifies that complaints and appeals are to be addressed to the AFF President.
<b>Standard-setting process</b>			
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	YES	Chapter 2 of Appendix 2 "Standard setting procedures" lists various interest categories of stakeholders which could form the ISRP, namely "academia, environmental non-government organizations (ENGOs), forest industry, forest owners, professional logging community, and public forestry agencies serving family forest owners". The BOD is responsible for identification and invitation of stakeholders.
	Process	YES	According to Appendix 2 "BOD ISRP Memo 2013 A" stakeholder mapping was carried out as the "review and analysis of the existing ATFS network and state committee composition, AFF and ATFS publication and newsletter subscription lists, partnering organizations, results of the National Woodland Owner Survey and consultation with the AFF Certification Committee". As the result of the

Requirement	Assessment basis	YES /NO*	Comment
			<p>stakeholder mapping exercise the following relevant key stakeholder groups were identified:</p> <ol style="list-style-type: none"> <li>1. Conservation organizations</li> <li>2. Forest workers</li> <li>3. Foresters</li> <li>4. Forest science and academia</li> <li>5. Forest owners</li> <li>6. Government agencies</li> <li>7. Forest Industry</li> <li>8. Buyers</li> </ol>
<p>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.</p>	Procedures	<b>YES</b>	<p>Appendix 2 BOD ISRP Memo 2013 complements the standard setting procedures and lays out the groundwork for a cross-sectional array of stakeholders invited to participate in the ISRP.</p> <p>Appendix 4 AFF Certification Committee Meeting: "...that by nature of the population ATFS works with, individual landowners with holdings of small, size, scale and intensity, they are to a large extent disadvantaged in the wider context of forestry... disadvantaged stakeholders" would broadly include "any resource limited stakeholder." The Committee also discussed the ways in which the AFF standard setting procedures have identified avenues for engagement of these stakeholders.</p>
	Process	<b>YES</b>	<p>Appendix 2 "BOD ISRP Memo 2013 A" contains a list of identified key stakeholders. In addition, according to representatives of the AFF, they also "made a specific effort to engage disadvantaged stakeholders, minority landowners/partners and Native American communities". Underserved or resource limited communities received a special attention being one of the key 5 principles for selection of stakeholders (with the other four being social, economic and ecological perspectives; gender; ethnic and cultural background; geographic diversity).</p>

Requirement	Assessment basis	YES /NO*	Comment
			In addition, the ATFS makes it generally possible to directly engage different stakeholders both locally and through organizations/committees in 44 states of the US.
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	<b>YES</b>	Appendix 2 “Standard setting procedures” requires the BOD to make a public announcement on convening the ISRP and initiation of the standard-setting process using various media sources. The procedures were approved in 2009.  Appendix 2 “Process Overview Schedule” defines the responsibilities and timelines for this revision round.  Comment: the AFF Board invites the members to participate on the Standard Review Panel (ISRP), aiming at balanced representation of the different interest categories (listed in the procedures).
	Process	<b>YES</b>	According to the AFF, various stakeholders have been invited to participate in the process via email lists, webinars (e.g. Dec 11, 2013 state leadership webinar), events, press releases (e.g. leadership update December 13, 2013) as well as personal outreach. Requirements for suitable media and timeliness are fulfilled.  According to Appendix 2 “Process overview schedule” the ISRP was convened by the AFF Board on November 12, 2013 and 14 members were announced on January 7, 2014.
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	<b>YES</b>	Appendices 2 on “Standard setting procedures” and “Process overview schedule” published the objectives, scope and steps of standard revision.  Appendix 2 on “Standard setting procedures” does not precisely specify what the announcement and the invitation shall include, although in practice the invitation included the information about the objectives, scope and the steps of the standard-setting process and its timetable,

Requirement	Assessment basis	YES /NO*	Comment
			<b>Comment:</b> In the future revisions, the public announcements on standard revision should readily include the required information.
	Process	YES	<p>State leadership webinar December 11, 2013 together with the leadership update from December 13, 2013 contain information about the objectives, scope, steps of the standard-setting process and the general timeline.</p>  <p><b>General Timeline</b></p> <ul style="list-style-type: none"> <li>• Winter 2014 <ul style="list-style-type: none"> <li>– January - March 2014: First 60-day public review</li> <li>– February 2014: Feedback session at NLC</li> </ul> </li> <li>• Summer 2014 <ul style="list-style-type: none"> <li>– June -August 2014: Second 60-day public review</li> <li>– July 2014: Feedback session at Convention</li> </ul> </li> <li>• Fall 2014 <ul style="list-style-type: none"> <li>– November 2014: AFF Board of Trustees</li> </ul> </li> <li>• 2015: Transition Year <ul style="list-style-type: none"> <li>– Standards &amp; Training at NLC</li> </ul> </li> <li>• January 2016: Full revised standard adoption</li> </ul> <p><small>GROWING STEWARDSHIP FROM THE ROOTS</small></p>
b) information about opportunities for stakeholders to participate in the process,	Procedures	YES	<p>Appendix 2 “Standard setting procedures” states that the AFF Board invites representatives to ISRP .</p> <p><b>Comment:</b> In the future revisions, the public announcements on standard revision should clearly indicate the possibility different interest groups have in participating on the ISRP, e.g. procedures to state the willingness to participate.</p>
	Process	YES	<p>The leadership update from December 13, 2013 contained an invitation for stakeholders to participate in the ISRP: <i>“To guide the process, AFF’s Board of Trustees invites a representative cross-section of forestry community leaders with a stake in the ATFS Certification Program or a sincere interest in forest sustainability on small private forest ownerships in the US to serve as an Independent Standards Review Panel (ISRP)”</i>.</p>

Requirement	Assessment basis	YES /NO*	Comment
<p>(c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,</p>	Procedures	YES	<p>Appendix 2 “Standard setting procedures” states that the AFF Board invites representatives to ISRP. The invited party is asked to nominate their representative.</p> <p>The Appendix 2 “BOD ISRP Memo 2013” describes the identification of disadvantaged stakeholders and the objective to take special measures for their participation in the standard revision</p> <p><b>Comment:</b> the invitation for stakeholder participation is not open, but limited to the parties invited by the AFF Board. However, the AFF Board shall respect a balanced representation.</p>
	Process	YES	<p>According to the AFF, various stakeholders have been invited to participate in the process by appointing their representatives using email lists (altogether 34 106 email addresses), webinars (e.g. state leadership webinar from December 11, 2013), events, press releases (e.g. leadership update from December 13, 2013) as well as personal outreach (e.g. phone calls to associations of indigenous peoples, native American communities etc.).The use of multiple media sources and the wide coverage of stakeholders are believed to be good enough for ensuring that the invitation has also reached disadvantaged and key stakeholders. The format of the invitation is considered appropriate.</p>
<p>d) an invitation to comment on the scope and the standard-setting process, and</p>	Procedures	NO Minor	<p>The standard revision procedures (Standard setting procedures or Process overview (all Appendices 2), do not provide an option to comment on the planned standard revision procedures.</p> <p><b>Justification for minor NC:</b> AFF should ensure that justifiable opinions on the planned revision procedures are duly taken into account before launching of the revision process.</p>
	Process	YES	<p>The leadership update from December 13, 2013 contained an invitation for stakeholders to participate in the ISRP: <i>“To guide the process, AFF’s Board of Trustees invites a representative cross-section of forestry community leaders with a stake in the ATFS Certification Program or a sincere interest in forest sustainability on small private forest ownerships in the US to serve as an</i></p>

Requirement	Assessment basis	YES /NO*	Comment
			<i>Independent Standards Review Panel (ISRP)</i> ". ATFS Standards of Sustainability were mentioned as the scope of the revision process.
e) reference to publicly available standard-setting procedures.	Procedures	<b>YES</b>	Appendix 2 on "Standard Setting Procedures" states that the document shall be publicly available upon request or online.
	Process	<b>YES</b>	Standard setting procedures were available online at <a href="https://www.treefarmssystem.org/stuff/contentmgr/files/2/4d57ff904f6c30951f4c3aab4d36455c/miscdocs/standardsettingprocedures.pdf">https://www.treefarmssystem.org/stuff/contentmgr/files/2/4d57ff904f6c30951f4c3aab4d36455c/miscdocs/standardsettingprocedures.pdf</a>
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	<b>YES</b>	<p>The standard revision procedures (all Appendices 2), do not give an option to comment on the planned standard revision procedures.</p> <p><b>Comment:</b> AFF should ensure that justifiable opinions on the planned revision procedures are duly taken into account before launching of the revision process.</p> <p>The AFF Board shall aim at a balanced representation of the ISRP: Appendix 2 "Standard setting procedures" states that the BOD has a right to limit the ISRP number of participants to correspond to "AFF's financial and staffing resources". Appendix 2 "BOD ISRP memo 2013" states the criteria for representativeness of stakeholder groups:</p> <ol style="list-style-type: none"> <li>1. <i>Social, economic and ecological perspectives</i></li> <li>2. <i>Gender</i></li> <li>3. <i>Ethnic and cultural background</i></li> <li>4. <i>Geographic diversity</i></li> <li>5. <i>Underserved or resource limited communities</i>".</li> </ol> <p><b>Comment:</b> The criteria to value the relevance of different interest groups in case there is a need to restrict the number of representatives are now presented in the AFF Board memo. Such information should be publicly available to interest groups.</p>
	Process	<b>NA</b>	No comments have been received from the public announcement and no nominations to the ISRP have been refused.

Requirement	Assessment basis	YES /NO*	Comment
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	YES	Appendix 2 "Standard setting procedures requires that <i>“comments, responses and respective modifications to the Standard shall be recorded and made available to all members of the ISRP”</i> .
	Process	YES	Information provided by the AFF staff and the responses to the stakeholder questionnaire indicate that working drafts are made available to all members of the ISRP.
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, and	Procedures	YES	Article 3, Appendix 2 "Standard setting procedures" determines that there should be at least two face-to-face meetings organized for ISRP members, in addition to conference calls and other electronic means of communications. The procedures determine that <i>“comments or views of the ISRP members as well as their representative organization or other interested parties shall be reviewed and considered in an open and transparent manner”</i> . Apart from that, the procedures determine that the decisions within the ISRP are to be made based on a consensus.
	Process	YES	ISRP members had two face-to-face meetings on March 25-26, 2014 and September 30-October 1, 2014 in addition to conference calls throughout April-May and August-September of the same year. Meeting summaries indicate that drafts were considered in an open and transparent manner and consensus forms indicate that decisions were made as a consensus of the ISRP.
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	YES	Chapter 3.5 of Appendix 2 "Standard setting procedures" states that comments and views of the ISRP members are to be considered in an open and transparent way and that resolutions and changes are to be recorded.
	Process	YES	Appendix 7 "ISRP Minutes" dated September 26, 2014 contains resolution of comments and proposed changes to the Standards according to comments and views of the ISRP members.



Requirement	Assessment basis	YES /NO*	Comment
			Replies to the stakeholder questionnaire sent by Indufor indicate that comments and views submitted by any member of the working group/committee were considered in an open and transparent way.
5.6 The standardising body shall organise a public consultation on the enquiry draft and shall ensure that:			
a) the start and the end of the public consultation is announced in a timely manner in suitable media,	Procedures	YES	Appendix 2 "Process Overview Schedule" includes the timelines for public consultation.
	Process	YES	Appendix 5 "Invitation to comment" is a news release which was published on the AFF website, available at <a href="https://www.treefarmssystem.org/atfs-invites-comments-on-draft-standards">https://www.treefarmssystem.org/atfs-invites-comments-on-draft-standards</a>
b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable,	Procedures	YES	Engagement of disadvantaged stakeholders are addressed in Appendix 2 "BOD ISRP Memo 2013 A" and Appendix 4 "AFF Certification Committee Meeting".
	Process	YES	Invitation to comment on the enquiry draft was published on the website. In addition, a public feedback session was organized at the ATFS National Tree Farmer Convention in Pittsburgh, Pennsylvania on July 17-19, 2014. Personal outreach (e.g. phone calls to associations of indigenous peoples, native American communities etc.) was also used by the AFF in order to ensure that the invitation reached disadvantaged stakeholders.
c) the enquiry draft is publicly available and accessible,	Procedures	YES	Appendix 2 "Standard setting procedures" requires that the enquiry (second) draft is made available.
	Process	YES	Invitation to comment on the enquiry draft was published on the AFF website
d) the public consultation is for at least 60 days,	Procedures	YES	Appendix 2 "Standard setting procedures" determines that the enquiry (second) draft is made available for review and comment for not less than 60 days.
	Process	YES	Appendix 5 "Invitation to comment" is a news release which was published on the AFF website, available at <a href="https://www.treefarmssystem.org/atfs-invites-">https://www.treefarmssystem.org/atfs-invites-</a>

Requirement	Assessment basis	YES /NO*	Comment
			<a href="#">comments-on-draft-standards</a> The invitation states that the comment period lasts for 60 days.
e) all comments received are considered by the working group/committee in an objective manner,	Procedures	YES	Chapter 4.5, Appendix 2 “Standard setting procedures” states that comments received during the second consultation period are to be reviewed by the ISRP in an open and transparent way.
	Process	YES	Appendix 7 “Public feedback” and minutes of the ISRP available at the AFF website indicate objective consideration of comments received during the second consultation period
(f) a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.	Procedures	YES	Chapter 4.6, Appendix 2 “Standard setting procedures” states that “ <i>the comments, responses to received comments and relevant modifications shall be made available to Commentators and public upon request of from AFF’s website</i> ”.
	Process	YES	Appendix 7 “Public feedback” contains a synopsis of comments received during both consultation periods and is also available on the AFF website at <a href="https://www.treefarmssystem.org/standards-summary-feedback">https://www.treefarmssystem.org/standards-summary-feedback</a>
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	YES	Chapter 2.7, Appendix 2 “Standard setting procedures” states that after the Standards are presented to the BOD, the AFF may organise a pilot testing of modifications of the Standards.
	Process	NA	No pilot testing has been needed as the AFF 2015-2020 Standards are revised Standards of 2010 – 2015 and 2004 – 2008 versions.
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	YES	Chapter 2.4, Appendix 2 “Standard setting procedures” requires that all decisions of the ISRP are taken based on the consensus approach, what applies also to recommendations for formal approval of the final draft.

Requirement	Assessment basis	YES /NO*	Comment
	Process	<b>YES</b>	Appendix 5 Consensus Forms 1-11 have been signed by the ISRP members demonstrating that they confirm their consensus regarding the final drafts of the Standards.
5.8 In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition:			
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.,	Procedures	<b>YES</b>	Chapter 2.4, Appendix 2 "Standard setting procedures" provides a definition of the consensus and a process of demonstrating a consensus:  <i>(a) A face-to face meeting where there is a verbal yes/no vote;</i> <i>(b) A face-to face meeting where there is a show of hands for a yes/no vote;</i> <i>(c) A face-to face meeting where there is a "secret ballot" of members on a yes/no vote;</i> <i>(d) A statement on consensus from the Chair at a face-to face meeting where there are no dissenting voices or hands (votes)...</i> <i>(f) A formal balloting process where votes are collated for the collective consensus decision.,"</i>
	Process	<b>YES</b>	Formal ballots were used in order to determine whether a consensus has been reached by the ISRP members. Appendix 5 Consensus Forms 1-11 have been signed by the ISRP members demonstrating that they confirm their consensus regarding the final drafts of the Standards. In addition, a third-party facilitator was hired for ensuring of consensus in the standard revision process.
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures	<b>YES</b>	Chapter 2.4, Appendix 2 "Standard setting procedures" provides a definition of the consensus and a process of demonstrating a consensus in a formal balloting process which also applies to telephone conference meetings.
	Process	<b>NA</b>	See PEFC Requirement 5.8 a

Requirement	Assessment basis	YES /NO*	Comment
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	Procedures	<b>YES</b>	Chapter 2.4, Appendix 2 "Standard setting procedures" provides a definition of the consensus and a process of demonstrating a consensus, e.g.:  <i>"(e) An e-mail meeting where a request for agreement is provided to members and the members providing written response (a proxy for a vote)."</i>
	Process	<b>NA</b>	See PEFC requirement 5.8 a
d) combinations thereof.	Procedures	<b>YES</b>	Chapter 2.4, Appendix 2 "Standard setting procedures" provides a definition of the consensus and a process of demonstrating a consensus in a general formal balloting process which also applies to combinations of different meetings.
	Process	<b>NA</b>	See 5.8 a
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):			
a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,	Procedures	<b>YES</b>	Chapter 2.4, Appendix 2 "Standard setting procedures" applies to such cases and lists, among others, the following mechanism for their resolution:  <i>"(a) Discussion and negotiation on the disputed issue within ISRP in order to find a compromise"</i>
	Process	<b>NA</b>	Meeting summaries available at the ATFS website and the information provided by the ATFS do not indicate that there have been any opposition or disputes during the revision process
	Procedures	<b>YES</b>	Chapter 2.4, Appendix 2 "Standard setting procedures" applies to such cases and lists, among others, the following mechanism for their resolution:

Requirement	Assessment basis	YES /NO*	Comment
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,			<i>“(b) Direct negotiation between the ISRP member submitting the objection and member(s) with different view on the disputed issue in order to find a compromise”</i>
	Process	NA	Meeting summaries available at the ATFS website and the information provided by the ATFS do not indicate that there have been any opposition or disputes during the revision process
c) dispute resolution process.	Procedures	YES	Chapter 2.4, Appendix 2 “Standard setting procedures” applies to such cases and lists the dispute resolution process as one of the mechanism for resolution of issues
	Process	NA	Meeting summaries available at the ATFS website and the information provided by the ATFS do not indicate that there have been any opposition or disputes during the revision process
5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.	Procedures	YES	Chapter 6, Appendix 2 “Standard setting procedures” is dedicated to the record-keeping which stresses out that <i>“all records, minutes, communications and other pertinent and tangible evidence of the Standard revision/modification process”</i> shall be available to the general public
	Process	YES	The standard setting process overview is available at <a href="https://www.treefarmssystem.org/standards-process-overview">https://www.treefarmssystem.org/standards-process-overview</a> , same as the ISRP meeting summaries and the summary of engagement process and feedback received
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	Procedures	YES	Chapter 2.5, Appendix 2 “Standard setting procedures” contains a provision which states that the AFF Board shall approve and adopt the Standards once the work of the ISRP is complete and the decisions have been adopted in a consensus.

Requirement	Assessment basis	YES /NO*	Comment
	Process	<b>YES</b>	Appendix 23 "AFF Board Approval Minutes" demonstrates that the Standards were approved during the AFF Board meeting on November 11, 2014. The consensus forms prove the consensus-based decision of the ISRP and were signed by the ISRP members.
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Procedures	<b>YES</b>	Upon acceptance, adopted standards are to be made publicly available (2.8 of Appendix 2 "Standard setting procedures").
	Process	<b>YES</b>	Appendix 8 "Press release" dated January 1, 2015 contains a press release notifying about adoption of the Standards and contains a link to access them on the AFF website.
<b>Revisions of standards/normative documents</b>			
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.	Process	<b>YES</b>	2010-2015 standards were adopted by the AFF Board in November 2009, while 2015-2020 standards were adopted in November 2014.
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	Process	<b>YES</b>	According to the information published at the ATFS website transition period for the Standards started on January 1, 2015 (the application date) and lasted for 1 year till December 31, 2015.  <a href="https://www.treefarmssystem.org/standards-process-overview">https://www.treefarmssystem.org/standards-process-overview</a>
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	<b>YES</b>	The application date has not exceeded a period of one year. The approved standards were published on January 1, 2015, what coincides with the application date.

Requirement	Assessment basis	YES /NO*	Comment
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	<b>YES</b>	The transition date has not exceeded a period of one year - January 1, 2015 - December 31, 2015

**PART II: Standard and System Requirement Checklist for Group Forest Management Certification (PEFC ST 1002:2010)**

ATFS reference documents

Group certification standard and monitoring checklists	Appendix 10 Independently Managed Group (IMG) Certification Standards Appendix 10 Monitoring Checklist
Auditing format	Appendix 19 InspectionRecordForm004
	Appendix 12 Eligibility Requirements and Guidance for Certification
Guidance document	Appendix 1 AFF 2015-2020 Standards of sustainability

Requirement	YES / NO*	Reference to system documentation
<b>General</b>		
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,	<b>YES</b>	Appendix 10 "Independently Managed Group (IMG) Certification Standards" contains a definition of a group organization: " <i>The American Tree Farm System® (ATFS) Independently Managed Group (IMG) Certification Standards (2015-2020) contain the requirements for the implementation by, and independent certification of, group organizations that manage a number of group member properties under one centrally administered program. The Group Organization holds the single certificate on behalf of the Group Members. This process is referred to throughout the document as "group certification".</i>
b) the group entity,	<b>YES</b>	Appendix 1 "AFF 2015-2020 Standards of sustainability" provides a definition of an independently managed group (IMG): " <i>A company, corporation, firm, authority or institution that is a legal entity. The entity has its own functions and administration and consists of a group manager and individual qualified group members seeking to collectively implement and become certified to the AFF Standards and ATFS IMG Standards. All IMGs are required to undergo audits, by accredited third-party assessors, to ensure conformance with the ATFS Standards and the ATFS IMG Standards.</i>



Requirement	YES / NO*	Reference to system documentation
c) the participant,	YES	<p>Appendix 10 “Independently Managed Group (IMG) Certification Standards” provides a definition of a group member dividing them into 3 categories:</p> <p><i>“Category 1 Group Members retain final decision-making authority for management activities to be conducted on their property. This category may include individuals, family ownerships, LLCs and other similar entities. The Group Member may, through contract or other agreements, utilize the Group Organization’s services for some or all management activities. Group Members may also participate in group management plans where management decisions and responsibilities are shared between the Group Organization and the Group Members.</i></p> <p><i>Category 2 Group Members have knowingly and affirmatively delegated full management responsibility for implementation of the AFF Standards to the Group Manager. Category 2 properties are under aggregated ownership as part of an investment fund portfolio. The Group Organization as the management consultant assumes overall operational management responsibility and performs all of the functions required for conformance to the AFF Standards. This category may include properties that meet the ATFS eligibility requirements and are managed by a Timber Investment Management Organization (TIMO). Category 2 Group Members include those entities referred to as Aggregated Management Groups (AMGs) in the ATFS Eligibility Requirements and Guidance.</i></p> <p><i>Category 3 Group Members are government entities. The property owner may have knowingly and affirmatively delegated full or partial authority for management and decision-making to the Group Manager, or the owner may retain all management authority. The Group Organization may perform some, or all, of the functions required for conformance to the AFF Standards. Examples of Category 3 members are: a local municipality, a public grade-school, a public university, a publically owned watershed authority, a tribal government, a state or federal agency”.</i></p>
d) the certified area,	YES	Appendix 12 “Final eligibility guidance” specifies acreage limitations for IMGs: <i>“Independently Managed Group (IMG) programs may enrol contiguous properties from 10 acres to 20 000 acres”.</i>
e) the group forest certificate, and	YES	Appendix 10 “Independently Managed Group (IMG) Certification Standards” specifies that “the Group Organization holds the single certificate on behalf of the Group Members”.
f) the document confirming participation in group forest certification.	YES	Appendix 10 “Independently Managed Group (IMG) Certification Standards”, chapter 1.3 states that it is one of the responsibilities of the group organization to issue a document confirming participation in group forest certification.
4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered <u>by additional group or individual forest management certifications</u> , the scheme shall ensure	NA	In the ATFS a landowner may not be certified under multiple certificates.

Requirement	YES / NO*	Reference to system documentation
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.		
4.1.3 The forest certification scheme shall define requirements for group forest certification which ensure that participants' <u>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.</u>	YES	Appendix 10 "Independently Managed Group (IMG) Certification Standards" requires that group members are subject to the internal monitoring and that the group organization is responsible for reviewing conformance of its participants to the AFF Standards:  <i>Section 3. Internal Monitoring and Reporting. 3.1 Ongoing Monitoring</i> <i>a. The Group Organization must establish and maintain a procedure and schedule for conducting ongoing monitoring of conformance with AFF Standards.</i> <i>c. The Group Organization must review conformance to the AFF Standards and document the relevant findings.</i>
4.1.4 The forest certification scheme shall define requirements for an <u>annual internal monitoring programme</u> that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.	YES	Appendix 10 "Independently Managed Group (IMG) Certification Standards" section 3.1 stresses that the group organization shall " <i>establish and maintain a procedure and schedule for monitoring</i> ". Appendix 10 "AFF STANDARDS (2015 – 2020) MONITORING CHECKLIST"
<b>Functions and responsibilities of the group entity</b>		
4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:		
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;	YES	Entering contractual relationship with the certification body on behalf of group members as one of the functions and responsibilities of the group organization is defined in Appendix 10 "Independently Managed Group (IMG) Certification Standards", section 1.1.  <i>1.1 Legal and General Requirements</i> <i>a. The Group Organization must be a legal entity competent to sign agreements with Group Members and to enter into binding contracts with certification bodies and other outside entities.</i>  General representation of the group organisation in the certification process
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;	YES	Appendix 10 "Independently Managed Group (IMG) Certification Standards" section 1.1 contains a respective provision: " <i>III. The Group Organization must have a written commitment to sustainable forestry and conformance to the AFF Standards IV. The Group Organization must ensure Group</i>

Requirement	YES / NO*	Reference to system documentation
		<i>Members have a written commitment to sustainable forestry and conformance to the AFF Standards of Sustainability</i> .
c) To establish written procedures for the management of the group organisation;	<b>YES</b>	Appendix 10 "Monitoring checklist" presents a detailed checklist of responsibilities of a group manager serving as written procedures for the management of the group organisation.
d) To keep records of: <ul style="list-style-type: none"> <li>- the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme,</li> <li>- all participants, including their contact details, identification of their forest property and its/their size(s),</li> <li>- the certified area,</li> <li>- the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;</li> </ul>	<b>YES</b>	<p>IMGs report to the ATFS which administers a database of group and individual certificates, and the ATFS, in its own turn, provides monthly reports to the PEFC. An example of such records is provided in Appendix 21 "PEFC monthly report" and contains records of participants (name, contact details, etc.), their certified area, certification body, auditor and so on. Additional evidence on that is provided by "Reporting guidelines 2017", "Reporting request 2017", "Group data reporting form 2017" provided by the ATFS.</p> <p>The ATFS also collects the records of the results of annual and internal monitoring – "2017 IMG Annual Reporting Summary" and Appendix 10 "AFF Standards Checklist" serve as the evidence.</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;	<b>YES</b>	<p>Appendix 10 "Independently Managed Group (IMG) Certification Standards" section 1.1 contains a general requirement for a written agreement between the group organization and its members.</p> <p>Appendix 19 "InspectionRecordForm004" is a form for initial certification. The landowner signs the form "affirming commitment to comply with the 2015-2020 AFF Standards of Sustainability and all relevant laws/regulations/ordinances. Signature further permits agents of ATFS ingress and egress for purposes of verification and in coordination of corrective or preventative activities. Participation in ATFS is purely voluntary and may be discontinued by landowner at any time or if found ineligible by ATFS. Only required for new certifications".</p>
f) To provide participants with a document confirming participation in the group forest certification;	<b>YES</b>	<p>Appendix 10 "Independently Managed Group (IMG) Certification Standards" section 1.3</p> <p>"d. The Group Organization must issue a document to each Group Member that confirms the Group Member participation and coverage by the scope of the third-party certificate."</p>

Requirement	YES / NO*	Reference to system documentation
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;	YES	<p>Appendix 10 “Independently Managed Group (IMG) Certification Standards” section 1.4 sets this requirement:</p> <p><i>“a. The Group Organization must ensure that Group Members are notified that they are subject to all of the requirements and privileges of membership in the American Tree Farm System®”.</i></p> <p>The reference to the Standards is considered as “information”.</p> <p>Appendix 1 “AFF Standards” contains the guidance for each performance measure and indicator. In addition, all the relevant documents for participants in the group certification are available online and IMGs provide additional guidance to them if needed.</p>
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements, and;	YES	<p>Annual internal monitoring programme aimed at determining compliance with the certification requirements is included into section 3 of Appendix 10 “Independently Managed Group (IMG) Certification Standards”.</p> <p><i>“The group organization must establish and maintain a procedure and schedule for monitoring”.</i></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.	YES	<p>Appendix 10 “Independently Managed Group (IMG) Certification Standards” section 3 and 4 cover the requirements for reviewing the results of the internal monitoring programme and the independent audit, as well as ensuring implementation of corrective and preventive measures together with group members due to identified non-conformities.</p>
<b>Function and responsibilities of participants</b>		
4.3.1 The forest certification scheme shall define the following requirements for the participants:		
a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	<p>Appendix 10 “Independently Managed Group (IMG) Certification Standards” section 1.1 contains a respective provision: <i>“IV. The Group Organization must ensure Group Members have a written commitment to sustainable forestry and conformance to the AFF Standards of Sustainability”.</i></p>
b) To comply with the sustainable forest management <u>standard and other applicable requirements</u> of the forest certification scheme;	YES	<p>Appendix 10 “Independently Managed Group (IMG) Certification Standards” says that <i>“the Group Organization must ensure Group Members have a written commitment to sustainable forestry and conformance to the AFF Standards of Sustainability”.</i></p>

Requirement	YES / NO*	Reference to system documentation
		<p>Appendix 19 "InspectionRecordForm004" states that by signing this form for initial certification the landowner <i>"affirms his commitment to comply with the 2015-2020 AFF Standards of Sustainability and all relevant laws/regulations/ordinances"</i>.</p> <p>Appendix 12 "Final eligibility guidance" also requires from landowners conformance with 2015-2020 AFF Standards of Sustainability.</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><b>YES</b></p>	<p>Appendix 19 "InspectionRecordForm004" states that by signing this form for initial certification the landowner <i>"permits agents of ATFS ingress and egress for purposes of verification and in coordination of corrective or preventative activities"</i>.</p> <p>Appendix 10 "Independently Managed Group (IMG) Certification Standards" requires that participants provide an access to <i>"sufficient information and properties"</i> during audits.</p>
<p>d) To implement relevant corrective and preventive actions established by the group entity.</p>	<p><b>YES</b></p>	<p>Appendix 10 "Independently Managed Group (IMG) Certification Standards" requires implementation of corrective and preventive measures by group organization together with its members.</p>

**PART III: Standard and System Requirement Checklist for Sustainable Forest Management (PEFC ST 1003:2010)**

ATFS reference documents

SFM standard	Appendix 1 AFF 2015-2020 Standards of Sustainability
	Appendix 10 Independently Managed Group (IMG) – Certification Standards
	Appendix 12 Eligibility Requirements for Certification: Landowner Requirements for ATFS Certification

Requirement	YES / NO*	Comment
<b>General requirements for SFM standards</b>		
4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall		
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.	<b>YES</b>	AFF 2015-2020 Standards of Sustainability (Standards) address aspects of sustainable forest management and incorporate eight standards with various performance measures and indicators. (Appendix 1) These Standards are described in detail which reflects management unit level, and are consistently related to required <i>forest management plan</i> , which shall be <i>consistent with the size of the forest and the scale and intensity of the forest activities</i> . (Appendix 1, Performance Measure 1.1) The acreage of individual forest owner is limited to <i>contiguous properties from 10 acres to 20,000 acres</i> . Applicability of the Standards on management unit level is also acknowledged by allowing forest owners to <i>certify a portion of their entire property portfolio but may not exempt a portion of a contiguous forest management unity that does not meet the AFF Standards</i> . (Appendix 12, p.1)
b) be clear, objective-based and auditable.	<b>YES</b>	The Standards are clearly written, objective-based, and auditable. They are described in detail, with additional guidance providing necessary level of information to understand the requirements on forest management unit level. (Appendix 1)
c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.	<b>YES</b>	The Standards include eight standards which compass key elements for sustainable forest resource management. Regarding activities with impacts on forest area, <i>the Landowner shall monitor forest product harvests and other management activities to ensure they conform to their objectives</i> .

		Furthermore, <i>harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i> (Appendix 1, Performance Measure 8.2)
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.	YES	The Standards require written forest management plans, clearly stated landowner objectives, descriptions of desired forest conditions, records of management activities and other records sufficient to demonstrate objective evidence of conformance to the Standards. (Appendix 1, Standard 1)  Conformance of the landowner is recorded on the Tree Farm Inspection Record. (Appendix 19)
<b>Specific requirements for SFM standards</b>		
<b>Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle</b>		
5.1.1 Forest management planning shall aim to maintain or <u>increase forests</u> and other wooded areas and <u>enhance</u> the quality of the economic, ecological, cultural and social <u>values of forest resources</u> , including soil and water. This shall be done by making full use of related services and tools that support <u>land-use planning and nature conservation</u> .	YES	The Standards build on sustainable forest management definition of PEFC, including <i>stewardship and use of forests and forest land in a way and at a rate that maintains their biodiversity, productivity, regeneration capacity, vitality and potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national and global levels and does not cause damage to other ecosystems.</i> (Appendix 1)  All eight Standards commit to this requirement. In particular:  Standard 1, PM 1.1 requires that <i>landowner demonstrates commitment to forest health and sustainability by developing a forest management plan and implementing sustainable practices.</i> Furthermore, the required management plan <i>shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i>  Standard 2 requires that <i>forest management activities comply with all relevant federal, state and local laws, regulations and ordinances.</i>  Standard 3, PM 3.1 requires that <i>landowner completes timely restocking of desired species of trees on harvested sites and non-stocked areas where tree growing is consistent with land use practices and the landowner's objectives.</i> This includes that <i>harvested forest land shall achieve adequate stocking of</i>

		<p><i>desired species reflecting the landowner's objectives, within five years after harvest, or within a time interval as specified by applicable regulation.</i></p> <p>Standard 4, PM 4.1 requires that <i>forest management practices maintain or enhance the environment and ecosystems, including air, water, soil and site quality.</i> This is mainly achieved by requiring <i>compliance with all state forestry best management practices that apply to air, water, soil and site quality elements.</i></p> <p>Standard 5, PM 5.1 requires that <i>forest management activities contribute to the conservation of biodiversity.</i> This includes protection of habitats and communities of threatened or endangered species , promotion of forest health (PM 5.3), and maintaining or enhancement of forests of recognized importance (PM 5.4).</p> <p>Standard 6 requires that <i>forest management activities recognize the value of forest aesthetics.</i></p> <p>Standard 7, PM 7.1 requires that <i>special sites are managed in ways that recognize their unique historical, archeological, cultural, geological, biological or ecological characteristics.</i> This includes requirement that the landowner <i>shall make a reasonable effort to locate and protect special sites appropriate for the size of the forest and the scale and intensity of forest management activities.</i></p> <p>Furthermore, Standard 8, PM 8.2 requires that <i>forest product harvests and other management activities are conducted in accordance with the landowner's objectives and consider other forest values.</i> This includes a requirement that <i>harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p>
<p>5.1.2 Forest management shall comprise the cycle of <u>inventory and planning</u>, implementation, monitoring and evaluation, and shall include an appropriate assessment of the <u>social, environmental and economic impacts</u> of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.</p>	<p>YES</p>	<p>AFF standard 1 PM 1.1 states that a certified landowner is obliged to have a forest management plan with attached maps and inventories and modify it based on results of monitoring:  <i>"Landowners are encouraged to update management plans based on monitoring".</i> In addition, <i>"management plans shall describe current forest conditions, landowner's objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources".</i>  Continuous improvement of a MP is also incorporated into a definition of a MP the ATFS provides:</p>



		<p><b>“management plan:</b> Documents that guide actions and that change in response to feedback and changed conditions, goals, objectives and policies. Management plans may incorporate several documents including, but not limited to, harvest plans, activity implementation schedules, permits, research, etc”.</p> <p>Appendix 10 on IMG Standards requires that the group organization makes sure that each member has either their own MP or a group MP.</p>
5.1.3 Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.	YES	<p>Guidance of Indicator 1.1.2 states that “<i>current conditions</i> [in a forest management] <i>may be described in general terms, including age, species and composition, or identified in accompanying maps and inventories</i>”.</p> <p>Landowners certified under the ATFS use the results of an annual forest inventory carried out by the United States Forest Service (USFS). The forest inventory includes random samples on both private and public lands. As it has been mentioned in 5.1.2 landowners are required to update their MPs based on the results of monitoring and inventories.</p>
5.1.4 Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They shall be based on legislation as well as existing land-use plans, and adequately cover the forest resources.	YES	<p>Standard 1, PM 1.1, <i>Landowner shall have and implement .... a forest management plan.</i></p> <p>I1.1.1: <i>Management plan shall be active, adaptive and embody the landowner’s current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>Standard 2, PM 2.1, I 2.1.1: <i>Landowner shall comply with all relevant laws, regulations and ordinances and will correct conditions that led to adverse regulatory actions, if any.</i></p>
5.1.5 Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products.	YES	<p>Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner’s objectives, management activities aimed at achieving landowner’s objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of</i></p>

		<p><i>recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p>Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p> <p><b>Comment:</b> in small-scale private forestry the management plans determine harvesting levels at the general level.</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.	YES	<p>Appendix 12, p.5: <i>Upon formal request, responsible ATFS representatives, IMG organizations and individual third-party certificate holders shall make available to interested parties the following information:</i></p> <p><i>...the landowner shall provide a summary of the management plan included in the public audit summary compiled by the Certification Body, omitting proprietary information and other confidential information.</i></p>
5.1.7 Monitoring of forest resources and evaluation of their management <u>shall</u> be periodically performed, and results fed back into the planning process.	YES	<p>Standard 1, PM 1.1, I 1.1.3: <i>The Landowner <u>should</u> monitor for changes that could interfere with the management objectives as stated in management plan. When problems are found, reasonable actions are taken.</i></p> <p>Standard 8, PM 8.2: <i>Landowner <u>shall</u> monitor <u>forest product harvests</u> and <u>other management activities</u> to ensure they conform to their objectives.</i></p> <p>Standard 1, PM 1.1, I 1.1.3 is not a mandatory core requirement but a directive whose application is based on professional judgement in the given context. As a directive it still requires monitoring of performance and in view of the objectives in the management plan when feasible on a certified woodland.</p>
5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	<p>Responsibilities are clearly defined and assigned.</p> <p>E.g. Standard 1, PM 1.1: <i>Landowner shall have and implement a written forest management plan consistent with the size of the forest and the scale and intensity of the forest activities, and</i></p> <p>Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities, and</i></p>

		<p>Appendix 10, Section 1, 1.2 Roles and Responsibilities:</p> <p>a. <i>The Group Organization must adhere to ATFS eligibility requirements and may further define membership parameters for its Group, if desired.</i></p> <p>b. <i>The Group Organization must designate a Group Manager(s) who is responsible for overseeing all of the administrative details of ATFS Group Certification and for ensuring compliance with all applicable requirements.</i></p>
<p>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>	<p><b>YES</b></p>	<p>Standard 3, PM 3.1: <i>Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.</i></p> <p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p>
<p>5.1.10 Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.</p>	<p><b>YES</b></p>	<p>Standard 3, PM 3.1: <i>Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.</i></p> <p>I 3.1.1: <i>Harvested forest land shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after harvest, or within a time interval as specified by applicable regulation.</i></p>
<p>5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:</p> <p>a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and</p> <p>b) entails a small proportion of forest type; and</p> <p>c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and</p> <p>d) makes a contribution to long-term conservation, economic, and social benefits.</p>	<p><b>YES</b></p>	<p>ATFS requires that certified land is forest. Conversion to other than forest land would thus lead to exclusion of the certified area or their deduction:</p> <p><i>"Annex 12: The acreage of the entire parcel is used for evaluation purposes. The evaluator is to deduct non-forest acres from the total acreage of the parcel".</i></p> <p>Primary forest issue is generally not applicable to the ATFS, but can be special site, e.g. a forest of recognized importance (FORI) that are often protected by regulations.</p> <p>Conversion of land use is generally regulated by the legislation and in order to convert lands a permit for zoning shall be obtained. The control over appropriateness of wood harvesting is also accomplished by the timber notification law that sets grounds for notifications of harvesting activities to the authorities.</p>

		<b>Comment:</b> The standard should refer to the ATFS general principles for certifiable forests and to relevant federal land use rules regulating forest conversion. The justifications presented above that set the restrictions for forest conversion are presented by the AFF.
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.	YES	Standard 3: <i>Landowner completes timely restocking of desired species of trees on harvested sites and <u>non-stocked</u> areas where tree growing is consistent with land use practices and the landowner's objectives.</i> PM 3.1: <i>Reforestation or <u>afforestation</u> shall be achieved by a suitable process that ensures adequate stocking levels.</i>
<b>Criterion 2: Maintenance of forest ecosystem health and vitality</b>		
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.	YES	Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i>  I 1.1.2: <i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i>
5.2.2 Health and vitality of forests <u>shall</u> 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.	YES	Standard 1, PM 1.1, I 1.1.3: <i>The Landowner <u>should</u> monitor for changes that could interfere with the management objectives as stated in management plan. When problems are found, reasonable actions are taken.</i>  Standard 5, PM 5.3, I 5.3.1: <i>Landowner <u>should</u> make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland fire, invasive species and other pests, pathogens or unwanted vegetation, to achieve specific management objectives.</i>  In addition, at the federal level there is a pest monitoring (biotic stress inspection) as part of the national pest monitoring. United States Forest Service, State Fire Agencies and National Interagency Coordination Center monitor forest fires and create maps of active wildfires.
5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems <u>shall</u> take into consideration the effects of naturally occurring fire, pests and other disturbances.	YES	Standard 4, PM 4.2: <i>Landowner <u>shall</u> consider a range of forest management activities to control pests, pathogens and unwanted vegetation.</i>

		<p>Standard 5, PM 5.3, I 5.3.1: <i>Landowner <u>should</u> make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland fire, invasive species and other pests, pathogens or unwanted vegetation, to achieve specific management objectives.</i></p> <p>The Standards contain a definition of “shall” and “should” clauses used in the Standards and their guidance as described in 5.1.7. Thus, “should” in the previously mentioned PMs still requires implementation as “shall” would require, but due to the nature of the ATFS and small landowners this requirement is tailored to their capabilities and resources.</p>
<p>5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.</p>	<p><b>YES</b></p>	<p>Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner’s current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></p> <p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner’s objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p>
<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><b>YES</b></p>	<p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>PM 4.2: <i>Landowner shall consider a range of forest management activities to control pests, pathogens and unwanted vegetation.</i></p> <p>Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p> <p>I. 5.1.1: <i>Landowner shall confer with natural resource agencies, state natural resource heritage programs, qualified natural resource professionals or review other sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.</i></p>
<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><b>YES</b></p>	<p>Standard 4, PM 4.3: <i>When used, prescribed fire shall conform with landowner’s objectives and pre-fire planning.</i></p>

		I 4.3.1: <i>Prescribed fire shall conform with the landowner's objectives and state and local laws and regulations.</i>
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.	<b>YES</b>	Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i> I 4.1.2: <i>Landowner shall minimize road construction and other disturbances within riparian zones and wetlands.</i> Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i> Waste management is regulated by the legislation, e.g. the Resource Conservation and Recovery Act, Comprehensive Environmental Response, Compensation and Liability Act, National Environmental Policy Act etc. and oil spillage by the Oil Pollution Act.
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	<b>YES</b>	Standard 4, PM 4.2: <i>Landowner shall consider a range of forest management activities to control pests, pathogens and unwanted vegetation.</i> I 4.2.1: <i>Landowner should evaluate alternatives to pesticides for the prevention or control of pests, pathogens and unwanted vegetation to achieve specific management objectives.</i>
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.	<b>YES</b>	U.S. EPA regulates pesticide use through the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). WHO highly toxic pesticides are not approved for forestry uses in the U.S. Standard 4, PM 4.2, I 4.2.2: <i>Pesticides used shall be approved by the Environmental Protection Agency (EPA) and applied, stored and disposed of in accordance with EPA-approved labels and by persons appropriately trained, licensed and supervised.</i>
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.	<b>YES</b>	See 5.2.9

5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	YES	See 5.2.9
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	YES	<p>Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>I 4.1.1.: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property.</i></p> <p>The use of fertilizers is regulated by the national and state legislation as well as by the best management practices.</p>
<b>Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)</b>		
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.	YES	Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i>
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.	YES	<p>Standard 1, PM 1.1: <i>Landowner shall have and implement a written forest management plan consistent with the size of the forest and the scale and intensity of the forest activities.</i></p> <p>I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.</i></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.	YES	<p>Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of</i></p>

		<p><i>recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p>
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.	YES	<p>Standard 3, PM 3.1: <i>Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.</i></p> <p>I 3.1.1: <i>Harvested forest land shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after harvest, or within a time interval as specified by applicable regulation.</i></p> <p>Standard 8, PM 8.2: <i>Landowner shall monitor forest product harvests and other management activities to ensure they conform to their objectives.</i></p> <p>I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p>
5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.	YES	See 5.3.4
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.	YES	<p>See 5.3.4</p> <p>Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></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.	YES	Standard 8, PM 8.2: <i>"Landowner shall monitor forest product harvests and other management activities to ensure they conform to their objectives. Indicator 8.2.1 Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the</i>



		<p><i>potential of the property to produce <u>forest products</u> and other benefits sustainably”.</i></p> <p>The definition of forest products provided by the AFF Standards includes NTFPs, e.g. “fruit, grass, fungi, berries, resins, gums, animal parts, water, soil, gravel, stone and other minerals on forest land”. Hunting and fishing are regulated by the applicable legislation.</p>
<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><b>YES</b></p>	<p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property.</i></p> <p>Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner’s objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p>
<p><b>Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems</b></p>		
<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><b>YES</b></p>	<p>Standard 1, PM 1.1, I 1.1.2: <i>... The forest management plan shall demonstrate consideration of the following resource elements: forest health, soil, water, wood and fiber production, threatened or endangered species, special sites, invasive species and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p>Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p> <p>I 5.1.1: <i>Landowner shall confer with natural resource agencies, state natural resource heritage programs, qualified natural resource professionals or review other sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.</i></p> <p>PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>I 5.4.1: <i>Appropriate to the scale and intensity of the situation, forest management activities should incorporate measures to contribute to the conservation of identified forests of recognized importance.</i></p>

<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> <ul style="list-style-type: none"> <li>a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;</li> <li>b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;</li> <li>c) endangered or protected genetic <i>in situ</i> resources;</li> </ul> <p>and taking into account</p> <ul style="list-style-type: none"> <li>d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.</li> </ul>	<b>YES</b>	<p>See 5.4.1</p> <p>Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i>  I 7.1.1: <i>Landowner shall make a reasonable effort to locate and protect special sites appropriate for the size of the forest and the scale and intensity of forest management activities.</i></p>
<p>5.4.3 Protected and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p>	<b>YES</b>	<p>See 5.4.1 and 5.4.2.</p> <p>Standard 5, PM 5, I 5.1.2: <i>Forest management activities shall incorporate measures to protect identified threatened or endangered species on the property.</i></p>
<p>5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.</p>	<b>YES</b>	<p>Standard 3, PM 3.1: <i>Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.</i>  I 3.1.1: <i>Harvested forest land shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after harvest, or within a time interval as specified by applicable regulation.</i></p>
<p>5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.</p>	<b>YES</b>	<p>See 5.4.4</p> <p>Standard 3, PM 3.1, I 3.1.1, Guidance: <i>...For reforestation and afforestation, use of native species and local provenances that are well adapted to site conditions is preferred, where appropriate. If non-native species are selected, landowner should consult or seek guidance from qualified natural resource professionals, such as agencies, academic institutions or professional associations, to ensure that potential negative impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and to determine whether negative impacts can be avoided or minimized.</i></p>

		Standard 5, PM 5.2: <i>Landowner should address the desired species and/or desired forest communities when conducting forest management activities, if consistent with landowner's objectives.</i>
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	<b>YES</b>	<p>Standard 3, PM 3.1: <i>Reforestation or afforestation shall be achieved by a suitable process that ensures adequate stocking levels.</i>  I 3.1.1: <i>Harvested forest land shall achieve adequate stocking of desired species reflecting the landowner's objectives, within five years after harvest, or within a time interval as specified by applicable regulation.</i></p> <p>Standard 5, PM 5.1, I 5.1.2 lists buffer zones as one approach for habitat protection of threatened and endangered species.</p> <p>Most U.S. states have reforestation laws which take into consideration ecological connectivity. However, at the private level connectivity is difficult to achieve.</p> <p><b>Comment:</b> It is recognised that implementation of rules on ecological connectivity in private small-scale forestry is difficult and the AFF Standards set requirements that are adaptable to the members' forests. Yet AFF should consider how to improve the connectivity in future standard revisions.</p>
5.4.7 Genetically-modified trees shall not be used.	<b>NO minor</b>	<p>Standard 2, PM 2.1: <i>Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities.</i></p> <p><b>Comment:</b> Currently, US regulations do not allow the release of GM forest trees for commercial timber production. Small-scale landowners will not either be early adopters of GMOs. once the GM trees start to be used. However, the AFF still needs to take a clear position on the use of GMOS and communicate it clearly.</p>
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.	<b>YES</b>	<p>Standard 5, PM 5.4 requires maintenance or enhancement of forests of recognised importance (FORIs) "<i>recognized for a combination of unique values, rather than a single attribute</i>". FORIs are defined by the ATFS and landowners.</p> <p>Protection of biodiversity is the key principle of the ATFS addressed in Standard 5 of the ATFS Standards of sustainability.</p>

<p>5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.</p>	<p><b>YES</b></p>	<p>Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i>  I 7.1.1: <i>Landowner shall make a reasonable effort to locate and protect special sites appropriate for the size of the forest and the scale and intensity of forest management activities.</i></p>
<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><b>YES</b></p>	<p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p> <p>Standard 5, PM 5.2: <i>Landowner should address the desired species and/or desired forest communities when conducting forest management activities, if consistent with landowner's objectives.</i>  PM 5.3, I 5.3.1: <i>Landowner should make practical efforts to promote forest health, including prevention, control or response to disturbances such as wildland fire, invasive species and other pests, pathogens or unwanted vegetation, to achieve specific management objectives.</i>  PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>The Standards contain a definition of shall and should clauses used in the Standards and their guidance as described in 5.1.7. Thus, "should" in the previously mentioned PMs still requires implementation as "shall" would require, but due to the nature of the ATFS and small landowners this requirement is tailored to their capabilities and resources.</p>
<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><b>YES</b></p>	<p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i>  I 4.1.2: <i>Landowner shall minimize road construction and other disturbances within riparian zones and wetlands.</i></p> <p>Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i></p>

<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>YES</p>	<p>Standard 8, PM 8.2, I 8.2.1: <i>Harvest, utilization, removal and other management activities shall be conducted in compliance with the landowner's objectives and to maintain the potential of the property to produce forest products and other benefits sustainably.</i></p>
<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>YES</p>	<p>Standard 5, PM 5.1: <i>Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law.</i>  I 5.1.1: <i>Landowner shall confer with natural resource agencies, state natural resource heritage programs, qualified natural resource professionals or review other sources of information to determine occurrences of threatened or endangered species on the property and their habitat requirements.</i></p> <p>Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i>  I 7.1.1: <i>Landowner shall make a reasonable effort to locate and protect special sites appropriate for the size of the forest and the scale and intensity of forest management activities.</i></p>
<p><b>Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)</b></p>		
<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>YES</p>	<p>Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources</i></p> <p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i>  I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property.</i>  I 4.1.2: <i>Landowner shall minimize road construction and other disturbances within riparian zones and wetlands.</i></p>
<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>YES</p>	<p>PM 5.4: <i>Where present, forest management activities should maintain or enhance forests of recognized importance.</i></p> <p>Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i>  I 7.1.1: <i>Landowner shall make a reasonable effort to locate and protect special</i></p>

		<i>sites appropriate for the size of the forest and the scale and intensity of forest management activities.</i>
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.	YES	Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i> I 4.1.1: <i>Landowner shall implement specific state forestry BMPs that are applicable to the property.</i> I 4.1.2: <i>Landowner shall minimize road construction and other disturbances within riparian zones and wetlands.</i>  BMPs give comprehensive guidance and requirements for planning and implementation of e.g. forest activities in view of soil and water protection.
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.	YES	See 5.5.3
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.	YES	See 5.5.3
<b>Criterion 6: Maintenance of other socio-economic functions and conditions</b>		
5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.	YES	The prologue of the Standards states that they are “ <i>designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; <u>promote environmental, economic and social benefits;</u> and work to increase public understanding of sustainable forestry</i> ”.
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	YES	See 5.6.1
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.	YES	Appendix 19 “InspectionRecordForm004” states that by signing this form for initial certification the landowner “ <i>affirms his commitment to comply with all relevant laws/regulations/ordinances</i> ”.

	<p>Standard 1, Glossary of Terms: <i>Landowner - Entity that holds title to the property to be certified.</i></p> <p>Appendix 12, Landowner Requirements for ATFS Certification: <i>Landowner requirements may be delegated to a designated representative (family members, trustees, property managers, qualified natural resource professionals, lawyers or others) to implement the requirements of the program on behalf of the landowner. However, landowners must be engaged in the decision to pursue certification. Ownership must be privately held or held by a public entity.</i></p> <p>Property rights are well-defined, protected by legislation and enforced as appropriate. This also applies to the rights of indigenous communities</p>
<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 on 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>Standard 8, PM 8.1, I 8.1.2: <i>Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices<sup>1</sup>.</i></p> <p><sup>1</sup><i>Auditors shall consider any complaints alleging violation of fair labor rules filed by workers or organized labor since the previous third-party certification audit. The auditor shall not take action on any labor issues pending in a formal grievance process or before federal, state or local agencies or the courts, however, until those processes are completed. Absent a record of documented complaints or non-compliances, contractors and managers are assumed to be in compliance with this indicator.</i></p> <p><b>YES</b></p> <p>I 8.1.2, Guidance: <i>Landowners and designated representatives are encouraged to stipulate that contractors <u>must</u> be in compliance with all relevant laws and regulations. A qualified natural resource professional can help with this process.</i></p> <p>Standard 5, PM 5.4 requires maintenance or enhancement of forests of recognised importance (FORIs) “<i>recognized for a combination of unique values, rather than a single attribute</i>”. FORIs are defined by the ATFS and landowners.</p> <p><b>Forests of recognized importance (FORI)</b> <i>represent globally, regionally and nationally significant large landscape areas of exceptional ecological, social, cultural or biological values.</i></p> <p>A consultative approach in forest use is required in areas classified as FORI. The ATFS Disputes and Appeals procedures also apply (Appendix 6).</p>

		<p><b>Comment:</b></p> <p>The standard does not address customary rights of local or indigenous people. However, certified landowners shall consider the cultural values of landscape level importance in forests classified as FORI.</p> <p>The rights of indigenous people are well defined by legislation and require their consideration in the use of public forests. In certified private forests landowners must comply with potential measures identified through the FORI classification.</p>
<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>YES</p>	<p>Standard 1, PM 1.1, I 1.1.1: <i>Management plan shall be active, adaptive and embody the landowner's current objectives....</i></p> <p>I 1.1.2: <i>... Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, forest aesthetics, biomass and carbon.</i></p> <p><b>Comment:</b></p> <p>Landowners obligations to provide access to the recreational use of forests are voluntary and required only if they are in line with land owners' objectives. Public access to forests should be considered as an option in planning but the standard does not require it, which is in line with the applicable laws and norms on customary rights in private woodlots.</p> <p>AFF should consider of strengthening the requirements on public access or recreational use of forests in its future revisions.</p>
<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>YES</p>	<p>Standard 7, PM 7.1: <i>Forest management activities shall consider and maintain any special sites relevant on the property.</i></p> <p>I 7.1.1: <i>Landowner shall make a reasonable effort to locate and protect special sites appropriate for the size of the forest and the scale and intensity of forest management activities.</i></p> <p>Standard 5, PM 5.4 requires maintenance or enhancement of forests of recognised importance (FORIs) "<i>recognized for a combination of unique values, rather than a single attribute</i>". FORIs are defined by the ATFS and landowners</p> <p>Annex 1, Glossary of Terms: <i>Special sites: Those areas offering unique historical, archeological, cultural, geological, biological or ecological value.</i></p>



		Also, areas classified as FORI at a landscape level shall be taken into consideration in forest management (see PEFC requirement 5.6.4).
<p>5.6.7 Forest management operations shall take into account all socio-economic functions, especially the recreational function and aesthetic values of forests by maintaining for example varied forest structures, and by encouraging attractive trees, groves and other features such as colours, flowers and fruits. This shall be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land.</p>	<p><b>YES</b></p>	<p>Standard 1, PM 1.1, I 1.1.2: <i>Management plans shall describe current forest conditions, landowner's objectives, management activities aimed at achieving landowner's objectives, document a feasible strategy for activity implementation and include a map accurately depicting significant forest-related resources.</i></p> <p><i>The forest management plan shall demonstrate consideration of ..., special sites, ...and forests of recognized importance. Where present and relevant to the property, the plan shall describe management activities related to these resource elements.</i></p> <p><i>Where present, relevant to the property and consistent with landowner's objectives, the plan preparer should consider, describe and evaluate the following resource elements: fire, wetlands, desired species, recreation, forest aesthetics, biomass and carbon.</i></p> <p>Standard 6, PM 6.1: <i>Landowner should manage the visual impacts of forest management activities consistent with the size of the forest, the scale and intensity of forest management activities and the location of the property.</i></p> <p>I 6.1.1: <i>Forest management activities should apply visual quality measures compatible with appropriate silvicultural practices.</i></p>
<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><b>YES</b></p>	<p><i>"Indicator 2.1.2 Landowner should obtain advice from appropriate qualified natural resource professionals or qualified contractors who are trained in, and familiar with, relevant laws, regulations and ordinances."</i></p> <p>Standard 4, PM 4.1: <i>Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property.</i></p> <p>The standard requires competence from contractors and encourages participants in the ATFS to obtain advice from them and other qualified professionals. The Standards do not explicitly encourage training.</p> <p>The Standards require compliance with BMPs that are mostly implemented by trained professionals.</p>

<p>5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.</p>	<p><b>YES</b></p>	<p><i>“Indicator 2.1.2 Landowner should obtain advice from appropriate qualified natural resource professionals or qualified contractors who are trained in, and familiar with, relevant laws, regulations and ordinances.”</i></p> <p><i>“Indicator 1.1.1 Management plan shall be active, adaptive and embody the landowner’s current objectives, remain appropriate for the land certified and reflect the current state of knowledge about natural resources and sustainable forest management.”</i></p> <p>The standard requires that a forest management plan is based on existing knowledge on SFM, implying also local knowledge. The Standards contain a voluntary requirement for working with natural resource specialists who are aware of local practices.</p>
<p>5.6.10 Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.</p>	<p><b>YES</b></p>	<p><i>“Indicator 5.1.2 Landowners or designated representatives are encouraged to consult with a qualified natural resource professional for assistance in planning to protect threatened or endangered species.”</i></p> <p><i>“Indicator 5.2.1 Landowner should consult available and accessible information on management of the forest for desired species and/or forest communities and integrate it into forest management.”</i></p> <p><i>“Performance Measure 5.4 Due to the small scale and low-intensity of family forest operations, informal assessment for the occurrence of FORIs through consultation with experts or review of available and accessible information is appropriate.”</i></p> <p><i>“Indicator 7.1.1 GUIDANCE: Special sites are diverse and can be identified through consultation and consideration processes described below and during property reconnaissance prior to preparing the management plan.”</i></p> <p>The Standards require consultation-based approach in regards to forest health, threatened or endangered species, forests of recognized importance and special sites.</p> <p>Th ATFS system includes Disputes and Appeals procedures (Appendix 6).</p>
<p>5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to</p>	<p><b>YES</b></p>	<p>AFF Standard 2 establishes the requirement that all activities shall be compliant with the federal, state and local legislation including Occupational Safety and Health Act. (the United States has not ratified the ILO Convention 155 on Occupational Safety and Health)</p>

<p>protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.</p>		<p>Indicator 8.1.2 specifically requires compliance with safety rules and regulations. Landowner “engages qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices”</p> <p>The Federal law US Occupational Safety and Health Administration (OSHA) and Canadian Center for Occupational Health and Safety stipulate the detailed requirements for work safety and health. State / Provincial legislation set more specific requirements e.g., on safety and monitoring.</p> <p>Legislation defines the detailed performance requirements.</p>
<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><b>YES</b></p>	<p>AFF Standard 2 establishes the requirement that all activities shall be compliant with the federal, state and local legislation. In addition, Indicator 8.1.2 requires that the landowner “engages qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices”.</p>
<p>5.6.13 Forest management shall comply with fundamental ILO conventions.</p>	<p><b>YES</b></p>	<p>The United State has not ratified the majority of ILO conventions relevant for the SFM. Nevertheless, AFF Standard 2 establishes the requirement that all management activities shall be compliant with the federal, state and local legislation.</p> <p>In 2005, an independent US lawyer conducted an analysis on the consideration of the core elements of the following ILO Conventions in the US legislation: ILO Conventions 29, 105 on forced labor, 87 and 98 on right to organize, 100 on equal remuneration, 111 on discrimination and 138 on minimum age of employment. The conclusion was that the US federal level legislation prohibit forced and child labor, guarantee freedom of association, right to organize, collective bargaining (with some limitations) and equal remuneration.</p>
<p>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>	<p><b>YES</b></p>	<p>“Indicator 1.1.1 Management plan shall be active, adaptive and .reflect the current state of knowledge about natural resources and sustainable forest management.”</p>

		<p>Requirements to contribute to research and to integrate scientific information to improvement of forest management are stated in Appendix 12 “Final Eligibility Guidance”:</p> <p><i>“The landowner(s) is engaged in active outreach efforts or can contribute to the effort. There are several ways that landowners can participate in outreach efforts. These include hosting forest-related tours on their property; joining a national, regional or local forestry or landowner association; supporting legislation that promotes private forest health and viability; supporting research that enhances the knowledge and practice of forest management on private forests; writing for publications in support of sustainable forestry on private lands; donating resources to these, and similar, forestry and forest landowner initiatives”.</i></p>
<b>Criterion 7: Compliance with legal requirements</b>		
<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><b>YES</b></p>	<p><i>“Standard 2: Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances”.</i> The standard also presents a three-tiered process for compliance with laws.</p> <p><i>“Performance Measure 2.1 Landowner shall comply with all relevant federal, state, county and municipal laws, regulations and ordinances governing forest management activities”.</i></p> <p><i>“Performance Measure 5.1 Forest management activities shall protect habitats and communities occupied by threatened or endangered species as required by law”.</i></p> <p><i>“Indicator 8.1.2 Landowner should engage qualified contractors who carry appropriate insurance and comply with appropriate federal, state and local safety and fair labor rules, regulations and standard practices”.</i></p> <p>Compliance with forest management legislation is addressed under PM 2.1, species protection under PM 5.1 and labour and safety issues under Indicator 8.1.2. Compliance with all relevant legislation is required by the Standard 2.</p>
<p>5.7.2 Forest management shall provide for adequate protection of the forest from <u>unauthorised activities</u> such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.</p>	<p><b>YES</b></p>	<p><i>“Standard 2: Compliance with Laws. Forest management activities comply with all relevant federal, state and local laws, regulations and ordinances”.</i></p> <p><i>“Performance Measure 8.2. Landowner shall monitor forest product harvests and other management activities to ensure they conform to their objectives.”</i></p>

	<p><i>"Indicator 2.1.2 GUIDANCE: Landowners are advised to engage qualified natural resource professionals and qualified contractors, licensed pesticide applicators and other trained professionals to support regulatory compliance".</i></p> <p><i>"Indicator 1.1.3. The Landowner should monitor for changes that could interfere with the management objectives as stated in management plan. When problems are found, reasonable actions are taken. Guidance: Landowners and designated representatives are encouraged to keep a written record of monitoring observations...These records may also be used to defend against adverse possession claims, substantiate any casualty losses and enable timely response to trespass, illegal dumping, timber theft and insect or disease outbreaks".</i></p> <p>The Standards require legal compliance from a participant and contractors. In addition, the System requires monitoring for changes in forests and contracting qualified licenced professionals.</p>
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**PART IV: Standard and System Requirement Checklist for Certification and Accreditation Procedures (Annex 6)**

Referred ATFS and other documents:

Certification	AFF website <a href="https://www.treefarmssystem.org/third-party-tree-farm-certification">https://www.treefarmssystem.org/third-party-tree-farm-certification</a> and <a href="https://www.treefarmssystem.org/transition-period">https://www.treefarmssystem.org/transition-period</a> Appendix 24: Inspector's Manual
Accreditation	Appendix 15: ANAB Accreditation Rule Appendix 15 SCC Accreditation Rule
Applicable documents of Sustainable Forest Initiative (SFI)	SFI 2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9 Appendix 26 ATFS and SFI Service Agreement
Grievance procedures	Appendix 6 Disputes and Appeals Procedures
Abbreviations:	
ANAB	National Accreditation Board is a US-based non-governmental standards organization
SCC	Standards Council of Canada. National accreditation body in Canada.
SFI	Sustainable Forestry Initiative

No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
<b>Certification Bodies</b>				
1.	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?	Annex 6, 3.1	<b>YES</b>	Audit arrangements under the ATFS and the role of ANAB and SCC are described on the AFF website <a href="https://www.treefarmssystem.org/third-party-tree-farm-certification">https://www.treefarmssystem.org/third-party-tree-farm-certification</a> and <a href="https://www.treefarmssystem.org/transition-period">https://www.treefarmssystem.org/transition-period</a>  <i>"Third party certification is the auditing of a forest certification system by an outside, accredited certification body."</i> Updated Appendix 15 "ANAB Accreditation Rule" is available at <a href="https://www.treefarmssystem.org/stuff/contentmgr/files/1/1ffc0bb4bab4fd01528d60f7bb54e143/pdf/anabrul27_2016.pdf">https://www.treefarmssystem.org/stuff/contentmgr/files/1/1ffc0bb4bab4fd01528d60f7bb54e143/pdf/anabrul27_2016.pdf</a>
2.	Does the scheme documentation require that certification body for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 3.1	<b>YES</b>	Appendix 15 "ANAB Accreditation Rule" article 1.7 defines ISO/IEC 17021 as one of the mandatory reference documents. Appendix 15 "SCC Accreditation Rule" article 2.2 sets conformance to the SFI 2010-2014 FM auditor qualification criteria as the prerequisite for participation in the SCC accreditation. The SFI 2010-2014 FM auditor qualification criteria,

No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
				<p>in its own turn, state that certification bodies have to meet the requirements of ISO 17021 or ISO Guide 65 (ISO 17065).</p> <p><b>Comment:</b> ATFS coordinates with SFI on accreditation requirements. It recognizes accreditations issued by ANAB as defined by ANAB Accreditation Rule 27 and by SCC as defined by Agreement between SCC and ATFS. The latter agreement is outdated and does not make a reference to valid documents.</p> <p>The update of the SCC Agreement is in progress, therefore no non-conformance has been raised due to reference to the old SFI set of standards.</p>
3	Does the scheme documentation require that certification body carrying out chain of custody certification against Annex 4 shall fulfil requirements defined in ISO Guide 65?	Annex 6, 3.1	<b>YES</b>	<p>CBs providing chain of custody certification shall comply with the standard ISO 17065:2012 on certification of products, processes and services as defined in the SFI accreditation requirements (2015-2019 Audit Procedures &amp; Auditor Qualifications and Accreditation - SFI Section 9).</p> <p><b>Comment:</b> In chain of custody certification ATFS relies on SFI approved standards and procedures. For PEFC endorsement the applicable standard is the international PEFC ST 2002:2013. AFF should be specific on the applicable chain of custody standard in ATFS documentation.</p>
4.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	<b>YES</b>	<p>Appendix 15 "ANAB Accreditation Rule" lists required documents for certification bodies the knowledge of which forms the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria.</p> <p>Appendix 15 "SCC Accreditation Rule" requires the CB to meet the SFI 2010-2014 forest management auditor qualification and competency criteria which, in its own turn, points out that "<i>audit teams shall have the competence (knowledge and skills) to conduct an audit in accordance with the principles of auditing... the team shall have knowledge of forestry operations, ...applicable laws and regulations, ...socio-demographics and cultural issues and one member shall be a professional forester as defined by the Society of American Foresters (SAF), the Canadian Institute of Forestry, or licensed or registered by the state(s) or province(s) in which the certification is conducted. For forest management audits, the audit team shall have expertise that includes plant and wildlife ecology, silviculture, forest modeling, forest operations, occupational safety and health, international labor standards, and hydrology</i>".</p>

No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
5	Does the scheme documentation require that certification bodies carrying out C-o-C certifications shall have technical competence in forest based products procurement and processing and material flows in different stages of processing and trading?	Annex 6, 3.1	<b>YES</b>	<p>In chain of custody certification ATFS relies on SFI approved standards and procedures.</p> <p>SFI recognizes chain of custody certificates issued against PEFC international chain of custody standard (PEFC ST 2003:2012) and consequently it is bound to require compliance with the PEFC standard on certification bodies certifying against the standard (PEFC ST 2002:2013). The standard, along with the accreditation standard ISO 17065 require that certification bodies and auditors have the required competence.</p> <p><b>Comment:</b> SFI rules apply in chain of custody certification</p>
6.	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?	Annex 6, 3.1	<b>YES</b>	<p>Appendix 15 “ANAB Accreditation Rule” lists requirement documents for certification bodies which also include the ATFS Standards and other documents including PEFC requirements for certification and accreditation and logo-use.</p> <p>Appendix 24 “Inspector’s manual” lists the following American Tree Farm System Certifier Eligibility Requirement:</p> <p><i>“All inspectors must successfully complete the Certifier Training Program. Inspectors must complete the refresher training every five years, which will coincide with AFF Standard revisions”.</i></p>
7.	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 or chain of custody certification?	Annex 6, 3.2	<b>YES</b>	<p>The Appendix 15 ANAB and SCC accreditation rules set requirements for substantial and procedural competence in certification, e.g. compliance with ISO 17021.</p> <p>Both rules require compliance with the SFI accreditation rules. Both bodies accredit only CBs that comply or are already accredited to SFI forest management certification.</p>
8.	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?	Annex 6, 3.2	<b>YES</b>	See requirement 7.



No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
9.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management or chain of custody audits? [1]	Annex 6, 3.2	<b>YES</b>	<p>Appendix 24 “Inspector’s manual” lists the following American Tree Farm System Certifier Eligibility Requirements:</p> <p><i>“The following minimum education and/or experience requirements are necessary for professionals certifying and inspecting Tree Farms.</i></p> <ul style="list-style-type: none"> <li>• <i>All inspectors must successfully complete the Certifier Training Program. Inspectors must complete the refresher training every five years, which will coincide with AFF Standard revisions.</i></li> </ul> <p><i>All inspectors must meet at least one of the four recognized requirements:</i></p> <ul style="list-style-type: none"> <li>• <i>A Bachelor of Science, Forestry degree, or higher from a Society of American Foresters (SAF) accredited program.</i></li> <li>• <i>Two-year forestry technician degree from an SAF recognized program.</i></li> <li>• <i>Anyone already serving as a Tree Farm inspector prior to July 31, 1999 is grandfathered in as an inspector provided their names were included in a list of inspectors submitted by the State Tree Farm Chair to the American Forest Foundation by July 31, 1999 and has completed the Certifier Training Program.</i></li> <li>• <i>Anyone professionally practicing forestry and meeting the following minimum educational requirements”.</i></li> </ul>
<b>Certification procedures</b>				
10.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management and/or chain of custody certification?	Annex 6, 4	<b>YES</b>	<p>Both ANAB and SCC present separate sampling procedures for regional groups, Independently Managed Groups (IMG), and individual certification holders (Appendix 15).</p> <p>Required compliance with ISO 17021 and PEFC Certification and Accreditation Procedures (Annex 6) also ask for internal procedures</p>
11.	Does the scheme documentation require that applied certification procedures for forest management certification or chain of custody certification against a scheme specific	Annex 6, 4	<b>YES</b>	<p>The Appendix 15 ANAB and SCC accreditation rules set requirements for substantial and procedural competence in certification, e.g. compliance with ISO 17021.</p>

No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
	chain of custody standard shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?			
12.	Does the scheme documentation require that applied certification procedures for chain of custody certification against Annex 4 shall fulfil or be compatible with the requirements defined in ISO Guide 65?	Annex 6, 4	<b>YES</b>	SFI 2015-2019 Audit Procedures & Auditor Qualifications and Accreditation - SFI Section 9  <i>Certification bodies and auditors conducting third-party audits to SFI Sections 2 ...in the SFI 2015–2019 Standards and Rules document must conform to the requirements of ISO 17021:2011 and ISO TS 17021-2....</i> SFI rules apply in chain of custody certification
13.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	<b>YES</b>	ISO 17021, that is a normative standard for certification procedures to be applied in management system audits, is fully compatible with ISO 19011 guidelines. Appendix 15 ANAB and SCC accreditation rules refer to the ISO/IEC 17021.
14.	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?	Annex 6, 4	<b>YES</b>	Chapters 3.3 of Appendix 15 “SCC Accreditation Rule” and “ANAB Accreditation Rule” requires that the CB notifies the AFF and SFI Inc. about “ <i>all issued certificates and the validity and scope of these certificates</i> ”.  SFI is the National PEFC governing body in US.
15.	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?	Annex 6, 4	<b>YES</b>	PEFC Logo usage controls are handled by the SFI as stated in Appendix 26 “2015 SFI Inc. services agreement with ATFS as PEFC US NGB and Secretary”.
16.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	<b>YES</b>	Appendix 15 “SCC Accreditation Rule” and “ANAB Accreditation Rule” contain a provision specifying that surveillance audits should be annual.
17.	Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?	Annex 6, 4	<b>YES</b>	According to Appendix 15 “ANAB Accreditation Rule” the accreditation cycle is 4 years and a so-called “reaccreditation assessment” shall be carried out about half a year before the accreditation expires.  ISO 17021 requires recertification every third year.
18.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	<b>YES</b>	Chapters 3.2 of Appendix 15 “ANAB Accreditation Rule” and “SCC Accreditation Rule” require a public access to summaries of certification reports.

No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
19.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	Chapters 3.1 of Appendix 15 "ANAB Accreditation Rule" and "SCC Accreditation Rule" determine that information from external parties can be used as the audit evidence.
20.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	YES	<p>ATFS have defined additional requirements for certification bodies. These are described in Annexes 1 to 3 in Appendix 15 on "ANAB Accreditation Rule" and "SCC Accreditation Rule" :</p> <p><i>4.1. ATFS Auditor Time</i></p> <p><i>4.1.1. The CB shall have a process to determine ATFS auditor time.</i></p> <p><i>4.1.2. ANAB shall review the CB's auditor time process during the application process and refer to it throughout the oversight of the ATFS program.</i></p> <p><i>4.2. Sampling Plan</i></p> <p><i>4.2.1. Sampling requirements for Regional Groups are in Annex 1 of this Accreditation Rule.</i></p> <p><i>4.2.2. Sampling requirements for IMGs are in Annexes 2 and 3 of this Accreditation Rule.</i></p> <p><i>4.2.2.1. CBs shall base their decisions to use Annex 2 or 3 to determine the sampling process for an IMG using the following criteria:</i></p> <ul style="list-style-type: none"> <li><i>• Annex 2 is applicable for sites consisting primarily of category 2 landowners [as defined by the American Tree Farm System Independently Managed Group (IMG) Certification Requirements (2015-2020)], and may be appropriate for IMGs with a small number of large landowners</i></li> <li><i>• Annex 3 is applicable for IMGs consisting primarily of several category 1 landowners [as defined by the American Tree Farm System Independently Managed Group (IMG) Certification Requirements (2015-2020)].</i></li> <li><i>• Either annex is applicable for state agency group managers, whereby the agency operates a number of offices and exercises some degree of regulatory oversight of landowners' management activities as a condition for continued membership in the group.</i></li> </ul> <p><i>4.2.2.2. The CB shall document its rationale for use of either annex.</i></p> <p><i>4.2.3. Sampling requirements for Individual Certification Holders are in Annex 4 of this Accreditation Rule".</i></p>
<b>Accreditation procedures</b>				
21.	Does the scheme documentation require that certification bodies carrying out forest management and/or chain of	Annex 6, 5	YES	ATFS requires third party certification and third-party assessor is a qualified ...professional who has completed ATFS required training for third-party

No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
	custody certification shall be accredited by a national accreditation body?			<p>assessors and is contracted ...by an IAF-accredited certification body (Appendix 1 AFF 2015-2020 Standards of sustainability).</p> <p>ATFS recognize ANAB and SCC as potential national accreditation bodies. Appendix 15 "ANAB Accreditation Rule" and "SCC Accreditation Rule" require that certification bodies are accredited by ANAB and SCC respectively</p>
22.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	<b>YES</b>	Appendix 15 "ANAB Accreditation Rule" and "SCC Accreditation Rule" require that CBs and their procedures are compliant with ISO 17021, which requires that accredited certificates bear an accreditation symbol.
23.	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?	Annex 6, 5	<b>YES</b>	<p>ANAB and SCC issuing accreditation bodies are both signatories to IAF multilateral agreement.</p> <p>ATFS requires that third party assessor is contracted by a CB that has an IAF recognized accreditation.</p>
24.	Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard 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 6, 5	<b>YES</b>	<p>Appendix 15 ANAB and SCC accreditation rules require compliance to the ISO/IEC 17021.</p> <p>The ANAB rule also specifies the ATFS forest management, group certification standards that are the reference basis for certification.</p> <p>ATFS does not address directly chain of custody certification. The chain of custody certification of ATFS certificate holders will be done in line with the SFI procedures and international PEFC ST 2002:2013.</p>
25	Does the scheme documentation require that certification body undertake chain of custody certification against Annex 4 as "accredited certification" based on ISO Guide 65?	Annex 6, 5	<b>YES</b>	Appendix 15 ANAB and SCC accreditation rules require compliance to the ISO/IEC 17021.
26.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	<b>YES</b>	Appendix 26 ATFS and SFI Service Agreement defines that the notification of certification bodies is the responsibility of the SFI Inc. SFI Inc is the national PEFC governing body.
27.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	<b>YES</b>	ATFS does not have own notification procedures but it relies on the PEFC Certification and Accreditation Procedures (Annex 6) and related SFI notification

No.	Requirement	Reference to PEFC Council PROCEDURES	YES / NO*	Comment
				rules. The SFI rules on notification are not public, but they were considered to comply with the PEFC requirements in the SFI system assessment.

**Part V: Standard and System Requirement Checklist for system specific Chain of custody standards – COMPLIANCE WITH PEFC ST PEFC 2002:2013 –**

ATFS applies the procedures Sustainable Forestry Initiative SFI has adopted the international PEFC chain of custody standard.

Chain of custody certification	<p>PEFC International Chain of Custody standard PEFC ST 2002:2013 applies</p> <p>However, ATFS documentation does not indicate when AFF has decided to adopt the standard PEFC ST 2002:2013 as the chain of custody standard. AFF shall specify the applicable standards in chain of custody certification. SFI rules on accreditation, certification and PEFC labelling apply in chain of custody certification under the ATFS:</p> <p><i>In PEFC chain of custody certification the accreditation shall be issued from the American National Standards Institute (ANSI) in the US or SCC in Canada. These two bodies issue accreditations based on ISO 17065 standard on requirements for bodies certifying products, processes, and services.(Source: Indufor assessment on SFI Scheme, <a href="https://www.pefc.org/images/stories/documents/NGB_Documentation/USA_-_SFI/Indufor_SFI_final_report.pdf">https://www.pefc.org/images/stories/documents/NGB_Documentation/USA_-_SFI/Indufor_SFI_final_report.pdf</a>)</i></p> <p>These rules conform to PEFC requirements, which is demonstrated through PEFC endorsement.</p>
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Not applicable

Part VI: Standard and System Requirement Checklist for Scheme Administration Requirements

No.	Requirement	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
<b>PEFC Notification of certification bodies</b>				
1.	<p>Are procedures for the notification of certification bodies in place, which comply with chapter 5 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i>?</p> <p>Quote: <b>PEFC GD 1004:2009 PEFC notification of certification bodies</b> 5.1 <i>The notifying body shall have written procedures for the PEFC notification which ensure that:</i></p> <p>a) <i>the PEFC notified certification body is meeting the PEFC Council's and PEFC endorsed scheme's requirements for certification bodies,</i></p> <p>b) <i>the scope of the PEFC notification, i.e. type of certification (forest management or chain of custody certification), certification standards and the country covered by the notification, is clearly defined ,</i></p> <p>c) <i>the PEFC notification may be terminated by the notifying body in the case of the certification body's non adherence to the conditions of the PEFC notification or in the case of the cancellation of the contract between the PEFC Council and the authorized body,</i></p> <p>d) <i>the PEFC notification is based on a written contract between the notifying body and the PEFC notified certification body</i></p> <p>,e) <i>the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System ,</i></p> <p>f) <i>the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc.</i></p>	Chapter 5	<b>NA</b>	Notification of certification bodies is the responsibility of the SFI Inc. as determined in Appendix 26 "2015 SFI Inc. Services Agreement with ATFS as PEFC US NGB and Secretary".

No.	Requirement	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
	<p>5.2 The notifying body may charge a fee for the PEFC notification. The authorized body shall inform the PEFC Council about the level of its PEFC notification fees, when requested.</p>			
<b>PEFC Logo usage licensing</b>				
2.	<p>Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i>?</p> <ul style="list-style-type: none"> <li>- The PEFC Logo usage license shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008.</li> <li>- ...may issue a PEFC Logo usage multi-license to a holder of a multi-site chain of custody certificate...</li> <li>- The licensing body shall have written procedures for the PEFC Logo licensing</li> <li>- The licensing body shall have a mechanism for the investigation and enforcement of the compliance with PEFC Logo usage rules (PEFC ST 2001:2008)</li> </ul>	Chapter 6	<b>YES</b>	<p>PEFC logo usage licensing is also the responsibility of the SFI Inc. as determined in Appendix 26 "2015 SFI Inc. Service Agreement with ATFS as PEFC US NGB and Secretary".</p> <p>The ANAB Accreditation Rule 27 (Appendix 15) obliges CBs to assess the use of PEFC logo.</p>
<b>Complaints and dispute procedures</b>				
3.	<p>Are complaint and dispute procedures in place, which comply with chapter 8 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i>?</p> <p>Quote: <i>1 The PEFC Council and the authorized bodies shall have written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme.8.2 Upon receipt of the complaint, the procedures shall provide for:</i></p> <ul style="list-style-type: none"> <li>a) <i>acknowledgement of the complaint to the complainant,</i></li> <li>b) <i>gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint,</i></li> </ul>	Chapter 8	<b>YES</b>	<p>Appendix 6 "Disputes and Appeals Procedures" are written procedures for dealing with complaints connected to standard setting and "<i>other issues relating to AFF</i>". Procedures for acknowledgement of the complaint, verification of data, decision-making and communication of the final decision included to Appendix 6 correspond to those specified in chapter 8 of PEFC GD 1004:2009.</p>

No.	Requirement	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
	<i>c) formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties</i>			





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## Appendix 2

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### **List of Stakeholders in the Independent Standard Review Panel**



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**Table 1 Independent Standard Review Panel**

	<b>Stakeholder organization (representatives)</b>	<b>Category</b>	<b>Geographic Focus and Physical Location</b>
1	Vermont Department of Forests, Parks and Recreation State Foresters	Government Agency (State)	New England/Vermont
2	Sustainable Forestry Initiative	Forest Industry/Conservation	National/South Carolina
3	Weyerhaeuser Company State Tree Farm Program Private Landowner	Forest Industry	Southern Region/North Carolina
4	NewPage Corporation	Forest Industry	Northeast/Maine
5	Wisconsin Department of Natural Resources Wisconsin State Tree Farm Program IMG Manager	Government Agency (State)	State/Wisconsin
6	Nisqually Land Trust Washington State Tree Farm Program	Conservation	State/Washington
7	International Association of Machinists & Aerospace Workers	Forest Workers	International & National/Oregon
8	Private Landowner	Forest Owners	Local/Oregon
9	Navajo Nation New Mexico Division of Forestry	Government Agency (State)	Local and State/New Mexico
10	F&W Forestry AFF Certification Committee IMG Manager	Foresters	National/Georgia
11	Environmental Defense Fund	Conservation	Southeast/North Carolina
12	United States Forest Service (USFS), State & Private Forestry Minority Landowner Outreach	Government Agency (Federal)	Southern Region/Georgia
13	Roanoke Electric Cooperative Minority Landowner Outreach	Buyers	Local/Virginia
14	University of Maine	Academia	Multiple Geographies/Maine



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Appendix 3

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## **Summary of Stakeholder Replies**



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<b>Aggregated results</b>	
Did you participate in the standard development?	Yes – 6 responses
By whom and when were you invited to participate to the development of the AFF 2015-2020 Standards of Sustainability for Forest Certification?	AFF/Sarah Crow – 6 responses Fall 2013 through November 2014 Early in the process; pre-process There was plenty of warning Early 2014
What was your main interest to consider participation to standard development?	Maintain rigor and meaning of the ATFS certification  Make sure the ATF Standard remains credible, practical and viable option for both landowners and stakeholders  Whether I could effectively add value to the standard review/development process. Also as the IMG manager for the largest certified Tree Farm group, considering proposed changes in light of the potential impacts on group members.  My main interest was to help develop a standard that is readily understandable and implementable by the average forestland owner.  Forest industry
In your view, have all interested parties relevant to standard development been proactively identified and invited and given the possibility to participate and contribute to the standard development?	Yes – 6 responses  But I don't know in regards to 1 ("disadvantages interest groups")  Not sure of outreach to tribal groups or other socially disadvantaged groups  Process was open, transparent and widely promoted. Comments received and considered from a diverse range of stakeholders.  The invitation list was quite diverse, which was part of the attraction to me to participate.
Did the organizer provide you with adequate material before the process?	Yes – 6 responses  AFF is extremely organized and gave us what we needed, as well as support for in person meetings. The process was top notch.  Materials were timely and complete  Absolutely. Sarah did a great job of keeping us informed and on track.
Did the stakeholders in the standard setting working groups represent the different interests in a balanced way?	Yes – 6 responses  There were some serious discussions about how to increase participation while maintaining standards. The tension there was a sign of balanced interests.  ISRP membership included Government Agencies (State), Conservation, Forest Industry, Forest Workers, Forest Owners,



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Aggregated results	
	<p>Foresters, Government Agencies (Federal), Buyers, NGOs and Academia.</p> <p>Diverse panel of stakeholders led the effort</p> <p>The stakeholder that participated all had good input in an open forum.</p>
Did the revision process follow the procedures that were communicated with participants in advance?	<p>Yes – 6 responses</p> <p>A timeline for standards review and development, including public input, was identified at the start of the process and was followed throughout.</p> <p>The procedures were well communicated and followed during the meetings and conference calls.</p>
Were you aware of any substantive or procedural complaints by any stakeholder on standard development?	<p>No – 5 responses</p> <p>Yes – 1 comment</p> <p>No complaints received to my knowledge.</p> <p>There were two opportunities for comments, and we reviewed all comments as part of the review process.</p>
Are you aware of any dispute settlement procedures in case of conflicting views in standard development?	<p>No – 4 responses</p> <p>Yes – 2 responses</p> <p>These procedures were explained to the ISRP at the start of our review process.</p> <p>No dispute settlement procedures needed.</p>
Do you believe any aspects of the standard or its development process deserve further consideration?	<p>No – 3 responses</p> <p>Yes – 2 responses</p> <p>I don't know – 1 response</p> <p>Turned out very well</p> <p>Yes, always, in the context of continual improvement.</p> <p>Standard sets clear criteria which are easily audited with results/findings replicable across a wide range of ownerships and management objectives. Guidance on interpretation of individual criteria is readily accessible.</p> <p>All aspects of the standards were thoroughly considered during the development process.</p> <p>Absent a publicly available GIS database indicator 5.4.1 Forest of Recognised Importance continues to be problematic.</p>
Have you been given a meaningful opportunity to contribute to standard formulation and to submit comments for further consideration?	<p>Yes – 6 responses</p>
Were the views and comments submitted by any participant in the Standard Setting Working Groups considered in an open and transparent way?	<p>Yes – 6 responses</p>



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<b>Aggregated results</b>	
	<p>All comments of members of the ISRP were openly received and discussed to achieve consensus.</p> <p>Yes, all comments were considered in an open and transparent manner.</p> <p>Absolutely</p>
Have all comments received in public consultations been discussed and addressed in an objective and transparent way?	<p>Yes – 6 responses</p> <p>I attended public forums where comments were received and addressed appropriately. The ISRP also received many comments which were considered and addressed appropriately.</p> <p>All comments received were discussed by the Independent Standards Review Panel.</p>
Were the criteria (requirements) in the standard agreed on in consensus?	<p>Yes – 6 responses</p>
Other comments and/or remarks	<p>The AFF approach to the new 5-year standards should be considered an exemplary model for others to follow.</p> <p>I was impressed by the efficiency, comprehensiveness and inclusiveness of the entire process.</p> <p>The process was transparent and collaborative. The stakeholders were diverse, energetic, and respectful of each other. I enjoyed the group and would volunteer for the next revision of the standard.</p>



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Appendix 4

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**Panel of Experts comments**

**Panel of Expert Comments on the Indufor Report:**

**Assessment of the Revised American Tree Farm System against the PEFC Council Requirements, Final Draft Report**

Consideration of comments: The substantial comments are listed in the table below with the consultant’s response to the comment.

1. Whenever an PoE identified an error, conflicting conclusion, or other comments that improved the report, the appropriate changes were made to the final report and relevant Appendices.
2. When PoE challenged the conclusion made on a compliance, it was considered and reviewed against the applied assessment principles e.g. regarding the validity of the different versions of System documentation in the assessment.
3. A description of potential changes made or not made with justification was given to support the consultant’s response.
4. Editorial and grammatical corrections are not listed in this table.

No	Report chapter / page	Consultant’s report statement	PoE member comment	Consultant’s response
1.			<p>This assessment report is very good and has a high quality. The report is easy to read and understand. It clearly demonstrates the conformity assessment process which the consultant has carried out. There is a short but very clear and comprehensive description of the method used in the assessment. Also, the lay-out of the report is excellent – you can easily find the core points of the assessment process in the report.</p> <p>Compared to many other reports the consultant does not repeat (“copy-paste -method”) herself in various parts of the report – this gives quality to the report.</p>	-----
2.			<p>The assessor has completed a thorough assessment of the ATFS and has set out the basics of the scheme in the body text to support the conclusions on conformity. Annex 1 is especially well populated with evidence to support the conclusion on conformity although with the reliance on Best Management Practices (BMPs) for many requirements, details of such BMPs</p>	<p>“The Standards” and “the AFF Board” will be used for consistency. In Appendix 1 “questions” are substituted with “requirements”.</p>



No	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
			<p>would have certainly reinforced conformity conclusions.</p> <p>Other comments:</p> <p>In terms of the overall documentation, the following terms are used;</p> <ul style="list-style-type: none"> <li>• AFF Standards</li> <li>• The Standards</li> <li>• The standards</li> <li>• AFF 2015-2020 standards</li> <li>• AFF 2015-2020 Standards of Sustainability</li> </ul> <p>presume all for the same suite of documents? Should adopt one abbreviated term from the formal description of the documents.</p> <p>In the same vain, for the AFF Board of Directors, the following terms are used:</p> <ul style="list-style-type: none"> <li>• Board</li> <li>• Board of Directors</li> <li>• BOD</li> <li>• AFF Board</li> </ul> <p>presume for the same entity. Should choose one and use it consistently.</p> <p>In Section 7. FOREST MANAGEMENT STANDARD, in the compliance statement to the 7 criteria, 3 use ATFS standards &amp; 4 use AFF standards – as only one set of 'standards', it should all be the one term for consistency</p> <p>In PEFC IGD 1007-04:2012, the assessor has indicated that the PEFC requirements are 'Questions' whereas I contend and backed up by the IGD title that they are indeed requirements for which evidence is provided by the assessor to draw the necessary conclusion on conformity/.</p>	

No	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
3.			This is a thorough and well presented report of a comprehensive scheme and I have little to add.	-----
4.	Several places, mainly in the check list PART III p. 31	Frequently in the checklist an issue is at least in part covered by the statement "Landowner shall meet or exceed practices prescribed by state forestry best management practices (BMPs) that are applicable to the property".	<p>The consultants were provided with an Appendix (14 in Table 4.2 on p9 of the report) entitled "Links to State BMPs".</p> <p>From this are they satisfied that in all 50 states there is adequate cover of issues such as soil and water protection, forest diversity, inclusion of dead wood etc.?</p> <p>There are many PEFC requirements which have compliance met by consideration of the BMPs. It would be beneficial if some examples relevant to requirements were listed in some manner. It would certainly support compliance against PEFC requirements.</p>	<p>The over 50 state level BMPs were not analysed, but the consultant has sampled a few BMPs and learned about their general level of performance requirements. Adequate assurance was gained on their robustness and capacity to address the locally relevant issues.</p> <p>An example: Washington state BMPs: <a href="http://www.dnr.wa.gov/about/boards-and-councils/forest-practices-board/rules-and-guidelines/forest-practices-board-manual">http://www.dnr.wa.gov/about/boards-and-councils/forest-practices-board/rules-and-guidelines/forest-practices-board-manual</a></p>
5.	Acronyms and Abbreviations Pg iii	ATSF American Tree Farm System	ATFS American Tree Farm System Also, the following: BOD; EPA; GM; MP; NC; PM; WHO; USFS	Revised and added
6.	Abbreviations, p. iii	I and PM is missing in the list	I – indicator used on p. 6 PM – performance measures used on pp. 6 and 17	Added
7.	PREFACE, 1 <sup>st</sup> para, Pg iv	... on the potential endorsement of the American ...	Isn't it the re-endorsement?	Revised
8.	1.1 Objective and Scope of the Assessment Pg 1, 1 <sup>st</sup> para	<p>'The American Tree Farm System (ATFS) was established in 1941 ...'</p> <p>'... over 20 million acres of forests.'</p> <p>'... for the PEFC Council re-endorsement in September 2016.'</p>	<p>Should add in 'or Scheme' into the abbreviation as it seems to be used interchangeably with ATFS</p> <p>While USA is still on this measure, PEFC is hectares, so the area in hectares should be provided as well This backs up the comment in the PREFACE</p>	Revised
9.	1.2 Assessment	'The international public	The PEFC website indicates the public	Revised

No	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	Process Dot point 1 Pg 1 Dot point 4 Pg 2, 2 <sup>nd</sup> para	consultation, organized by the PEFC Council was held in May – July 2013.'  the possibility to discuss with...	consultation period was 8/11/2016 to 7/01/2017 NOT in 2013 which was the previous re-endorsement!  To discuss what – needs just a little bit more information	An explanation was added: ATFS provided further explanations and evidences, e.g. minutes, on the issues with minor non-conformities or comments.
10.	1.3 Report Structure Pg 2		There are two paragraphs for Chapter 8 and Chapter 9!	Revised
11.	2 RECOMMENDATION Pg 3,1 <sup>st</sup> para Comments, 2.  Forest management standard, 3. Pg 4 5. 2 <sup>nd</sup> para 6. 3 <sup>rd</sup> para  7. 8. 2 <sup>nd</sup> para	'... the PEFC Council endorses the revised ...'  '... to the parties invited by the Board.' '... and communicate it clearly.' 'The AFF Standards 2015-2020 ...'  'The standard does not address ...' 'AFF should consider of strengthening the requirements on public access or recreational use of forests in its future revisions.' Use of SFI, ANAB and SCC  '... (see 2015-2019 Audit Procedures & Auditor Qualifications and Accreditation – SFI Section 9).'	As indicated in previous comments, is it re-endorsement?  Presume it's the AFF Board – clarify  This text in other font/font size! In 1.1 & 1.3, it is the ATFS Standards ... - need to be consistent on which term is applicable for the standard Again, is it AFF or ATFS or FMP?  This doesn't seem to recognise the private land ownership as a relevant condition!  First use but need term in full before the abbreviation Is this part of the report or is it another document as part of the SFI documentation? It isn't clear	Revised  The PEFC C6, Indicator 5 requires adequate public access to forests for the purpose of recreation. Private ownership, as such, is not a justification to restrict the access only to public forests. In many countries certified private forests are fully or partly accessible to public. Therefore, AFF should consider the ways to comply with the requirement as well as possible in the US.  No changes to the report was done based on this comment  Abbreviations explained The word "see" eliminated to avoid the confusion
12.	5.6.5 Pg 49	Comment – 1st paragraph	This is problematic considering as are dealing with 'family owned small wood lands' i.e. privately owned in the main	
13.	2. p 3	...ATFS documentation and	(red) the word "largely" gives an impression that	Removed

No	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		standard requirements largely comply with the PEFC requirements, but two minor non-conformities and eight comments were raised to be considered in the future development of the Scheme.	there are some other minor problems in ATFS than the two minor NCs mentioned. Is the word "largely" needed here at all?	
14.	2. p. 3	The standard setting procedures were publicly available but they should be amended to also address the possibilities of stakeholders to comment the planned process before its launching. AND . However, the AFF still needs to take a clear position on the use of genetically modified organisms (GMOs) and communicate it clearly.	On page 11 (Box 4.1) the consultant states: "Generally, a minor non-conformity should be Revised within 6 months. The assessor may recommend a longer period where justified by particular circumstances."  I would like to see a statement of the consultant already in chapter 2 ("Recommendation"), how and when these two minor nonconformities shall be solved.	Recommendation (Chapter 2) was reformulated as follows: ATFS documentation and standard requirements comply with the PEFC requirements apart from two minor non-conformities. The minor non-conformities relate to invitation for standard revision and to ATFS policy towards genetic modification. Neither of the non-conformities risk the stakeholder participation in standard setting or compliance with PEFC forest management standards, but they are aspect that are addressed in PEFC rules but currently ignored in ATFS development. In addition, eight comments were raised to be considered in the future development of the Scheme.
15.	2. p. 3	Comments: Standard revision 2. (content)	The second comment of the consultant could easily be classified as a minor NC, as well. Usually the participation of interested parties has been an important issue in forest certification.	ATFS had solid criteria to select stakeholders to standard revision in case of unexpected interest to accommodate a large number of organisations. The only problem that public did not have open access to these rules. Consultant concludes that the issue deserves a comment on the request for improvement but it is not an explicit non-conformity to PEFC requirement.
16.	2. p. 2-3	Comments: Forest management standard 3. (content)	The third comment of the consultant concerns "conversion of forests to other type of land use". Also this issue is usually considered as an important issue in forest certification. However,	Although ATFS does not directly set restrictions to conversion, it relies on the following rules that result in a ban on conversion in certified forests:

No	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
			ATFS does not address conversion. I would like to see more demanding comment of the consultant to be included here, in order to resolve this almost obvious nonconformity. – This comment could also easily be classified as a minor NC.	<ul style="list-style-type: none"> <li>- certified land shall be forest, if cleared it is not part of certificate</li> <li>- Values of important sites FORI shall be protected</li> <li>- Laws regulate land use changes, conversion requires a permit</li> </ul> <p>This evidence is deemed adequate to ensure that uncontrolled conversion does not take place in ATFS certified forests. Despite of this ATFS should address the issue in the standard.</p> <p>The ATFS provides auditors the tools to address any intention to scale down the forest area in order to comply with the environmental values</p>
17.	5.1.11 Pg 36	1st and 2nd paragraphs	Couldn't such deductions be used to meet environmental or social values as part of the certification process?	
18.	3.3 p. 7	Although not applicable in traditional forest management on private woodlands, these PEFC requirements should be addressed in an appropriate way by the ATFS.	"Should be addressed" – but how and when? I want to see a demanding statement of the consultant in this report, mainly in para "Recommendation".	Recommendation is revised see point 14. The issues listed are raised as minor conformities or recommendations.
19.	4. pp. 8-12	Content of the chapter	Very informative and clear description of the assessment process ☺	-----
20.	4.2 ATFS Documentation Pg 9	Table 4.1 Appendix number  '1) ATFS does not have a ...'	What does this refer to? No appendices in this report except Appendix 1 which isn't the AFF Standards 2015-2020 There is no note 1) in the Table! This information should be a full paragraph not a note as it relates to documentation which is part of assessment	Revised
21.	4.3 Methods Pg 10	Use of 'stakeholders' and 'parties'	Presumably these are the same? If so, one term would be preferable otherwise need to distinguish between the two terms	Revised
22.	4.3. p. 11-12	The content of Box 4.1 and	The consultant introduces a fifth element –	-----

No	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		"A comment is raised on scheme related issues that establish a justified gap in conformity to literal interpretation of PEFC requirements or deserve other consideration in implementation or in future revisions"	"Comment" to Assessment Scales used in the Conformity Evaluation. With the "Comment" the consultant may reduce the number of "minor nonconformities" in the report. – I found this very useful tool to clarify minor nonconformities which have only a marginal meaning in conformity comparisons.	
23.	5. and 6. pp. 13-16	Content of the chapters	Informative chapters which give a clear view of the ATFS revision process ☺	-----
24.	5.3 Process Implementation Pg 14	'... the ATFS Appendix 2 "Process overview schedule".	Is this from Table 4.2? if so, the titles do not match or there isn't enough information in the Table 4.2 description	Revised
25.	5.3.1 Standard Revision, 4 <sup>th</sup> para Pg 14 5 <sup>th</sup> para Pg 15	The dot point list  'January announcement also indicated ...'	These appear to be other avenues of communications rather than email lists – please clarify Which year? – presume 2015 if following Nov '14 invitation or is it 2014?	Dot point list describes the information channels used to invite people to comment the first draft standard. January 7, 2014 – Revised
26.	6 Group Certification Arrangements 1 <sup>st</sup> para Last para Pg 16	'...has been excluded from the scope due to contradicting information ...'  'The ATFS should specify the main terminology related to group certification.'	What is the subject of the scope?  Is this a Comment i.e. under 2. Recommendation? If so, should it be under 2. Comments?	The scope of the present assessment – Revised  The comment is merely a notion, because in the first place group certificate verifies the conformity group's administrative procedures and it does not directly require conformity to SFM standard. However, the procedures require the conformity and there are adequate monitoring measures to verify it. Thus, group certificate demonstrates indirectly that a member's forests are sustainably managed. Reformulated: ATFS should better describe how group certificate provide evidence on

No	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
				SFM. Added as a recommendation.
27.	7.1 General Remarks 1 <sup>st</sup> para 2 <sup>nd</sup> para Pg 17	'The AFF 2015-2020 Standards of Sustainability (AFF Standards) ...'  Use of 'The Standards' in 2 <sup>nd</sup> /3 <sup>rd</sup> sentence	This seems to answer my comment at 3.2 and 3.3!  Have used an abbreviation in 1 <sup>st</sup> paragraph but don't use correctly here!	See comment 18
28.	7.2 Analysis Results Pg 17	No text	This uses the PEFC criteria as basis but no lead in discussion. It needs some text on assessing AFF standards against PEFC criteria.	Text added under chapter 7.2.
29.	7.2.1 Criterion 1 Pg 17, 5 <sup>th</sup> para 6 <sup>th</sup> para	'... can lead to dismissal of a certificate.'  'Currently, the regulations should be ...'	Presume it's the forest management certificate?  Are they local, state, national?	Revised  Land use zoning is regulated at all levels – national, state and local. Text amended accordingly.
30.	Criterion 6 2 <sup>nd</sup> para 3 <sup>rd</sup> para Pg 20	According to a professional legal assessment of 2005 ...' 'However, the standard does not define in a sufficient ...'	By whom and for what task?    Is it one of the eight standards or is it the whole of the eight standards?	Added to text: The assessment was requested by forestry sector organisations when preparing for standard revisions and previous endorsement rounds. Indufor has had the possibility to read the document but it is not openly accessible.  Revised to standards.
31.	8 Chain of Custody Certification Pg 21	'... The ATFS relies on SFI rules for chain of custody ...'	Isn't this the section about a CoC standard? To me, rules are quite different to a standard	Revised
32.	9 PEFC Logo Usage 1 <sup>st</sup> para Pg 21	'...(PEFC/FR ST 2001:2008).'	This isn't listed in 4.1! Also, what is the 'FR' reference?	Revised
33.	10.2 Notification	... assessment of SFI	In which year, as this would be very applicable to	2016 – Revised

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	of Certification Bodies, 2 <sup>nd</sup> para Pg 22	scheme they were reviewed ...'	the current ATFS assessment	
34.	11 Complaints and Dispute Procedures, 2 <sup>nd</sup> para Pg 23	Last sentence	This is not well written – please revise	Revised
35.	12.1 International PEFC Consultation Pg 24	'... was held in May – July 2013.'	See comment at 1 under 1.2 Assessment Process	Revised
36.	12.1 p. 24	The international public consultation organized by the PEFC Council was held in May – July 2013. No comments were received during the consultation.	Board of Directors of the PEFC should consider new ways for international public consultation of the revision of national certification schemes. – So far this type of consultation has received as many as none comments ☺	-----
37.	Table 1	F&W Forestry USFS, ...	These should be in full!	Revised
38.	Appendix 1 to the Final Draft Report	General comments	As with the main body of the report, the Board of AFF is referred to by various terms: BOD; AFF Board; AFF Board of Trustees; AFF Board of Directors – one abbreviation should be used consistently. In each Part where the reference documents are listed, there are odd quotation marks – are they needed? If so, please open and close around the document as required.	Revised
39.	Appendix 1	Content	The Appendix has been prepared very well. It gives a clear and comprehensive understanding of the conformity assessment process	-----
40.	Explanations Pg 3	'... raise issues that shall be taken into consideration ...'	Is this a mandatory statement which the PEFC will seek compliance by the ATFS?	This is not a mandatory statement but rather consultant's explanation of the purpose of the comments given.
41.	PART I	Table heading 'Question'	I don't believe it is as such – these are the PEFC	Revised



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	Pg 4,		requirements. See title of this part of the assessment report which has 'requirement' not question	
42.	4.2 Pg 5		Does it cover review?	ATFS states that standard setting procedures shall be published prior to the revision. Indufor verified that they were reviewed although it is not stated in the procedures.
43.	4.4 a) Process, Pg 7	The dot points	Are these the source of the email lists ie those signed up or receiving the publication?	The list of organisations and their newsletters describes the information channels used in invitation to standard revision
44.	4.4 b) Process, Pg 8	'... the geographical scope.'	This is only one aspect of the 'representativeness of candidates' from 4.4 a)	Balanced representation of different interest groups is the priority when assessing the level of representativeness. Possibilities of the vulnerable groups to participate is also duly reviewed. Geographic representation is ensured through national organisations and through regional participation. Attention is paid to gender balance if there is evidence that no efforts are made to engage both men and women in the process.
45.	5.2 Procedures, Pg 12	'Appendix 4 AFF Certification Committee Meeting ...'	A meeting 'minute' isn't really a procedure unless it is codified in some manner	Revised
46.	Appendix 1 p. 15	Justification for NC: AFF should ensure that justified opinions on the planned revision procedures are duly taken into account before launching of the process.	The consultant wants this NC to be resolved in 6 months (?) Should there be some proposal(s) of the consultant how ATFS has to proceed?	It is evident that any non-conformities related to standard setting cannot be corrected within 6 months. It would be possible for SFM or group certification related NCs. The assessment framework does not provide own categories for NCs that are irreversible and are related to periodic activities. If there is evident need for improvement a NC is a better ranking than a comment that only provides a recommendation.
47.	Appendix 1 p. 16	Comment: The criteria to value the relevance of different interest groups in case there is a need to	This is a good comment and ATFS should follow it. – Does PEFCC or the secretariat have a follow-up system in place for this kind of positive comments for various national schemes?	-----

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		restrict the number of representatives are now presented in the board memo. Such information should be publicly available to interest groups		
48.	5.3 a) Procedures, Pg 13,	'Although in practice the invitation ...'	Doesn't this relate to the Process!	The referred sentence ... although give examples that describe the gaps in the procedural requirements. The sentence was placed after the procedural gaps.
49.	5.4 Procedures, Pg 16	Comment	This should be part of the procedures which, as per 5.3 e), is online	The comment: <i>The criteria to value the relevance of different interest groups in case there is a need to restrict the number of representatives are now presented in the AFF Board memo. Such information should be publicly available to interest groups</i> , relates to procedural document that should be available to public.
50.	5.5 a) Process, Pg 17	'ATF staff'	Is this AFF or ATFS staff?	Revised
51.	5.5 c) Process, Pg 17	'Appendix 7 "ISRP Minutes" dated September 26, 2014 ...'	Presume this is an example as the title in Table 4.2 indicates a plural of minutes i.e. more than one	Yes
52.	5.6 c) Process, Pg 18	'... on the website.'	Presume it's the AFF website – clarify	Revised
53.	5.6 e) Process, Pg 19	Minutes of the ISRP available ...'	Is this Appendix 7?	Revised
54.	PART II Pg 25	Compliance of PEFC/FR ST 1002:2016 Regional and group forest certification rules – Requirements with the PEFC requirements	What is this standard – see item 4 under 4.1! A check of the PEFC website confirms the item 4 standard is the applicable standard!	Revised
55.	4.1 d) Pg 26		This defines size but does it encompass holdings, be it one or many, that a Category 1, 2 or 3 member may have?	The definitions of group member categories and IMG standards to form a group do not have any minimum or maximum numbers for ownerships. The 20 000 acre (8 091 ha) is the cap for the area of one group certificate

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				according to IMG standard.
56.	4.1 b) Pg 31	Appendix 9	Should this be in the list of references documents at the start of this PART?	Appendix 1 and 9 are same documents, reference to Appendix 9 eliminated
57.	4.1 c) Pg 31		Doesn't seem to cover applicability to 'all operators'?	<p>The standards require that all activities shall conform to land owner's objectives. He/she shall have a management plan that among other, demonstrates conformance to the Standards. The latter is recorded on a Tree Farm Inspection Record.</p> <p>The Standards apply to all operators through the obligation to respect forest owner's objectives. The approach is a bit complex but it is the workable adaptation of PEFC requirement in the context of AFF members.</p> <p>No amendments was made to the text.</p>
58.	5.2.5 Pg 38	Standard 5, PM 5.1	It would be difficult for small forest owners to meet the latter part of this requirement as a stand-alone but the PM's in combination with other small forests, larger forests on public/private and conservation reserves contribute from a small owners perspective	It is correct that small woodlots have only a minor role in strengthening of natural regulation mechanisms. However, ecosystem resilience (prevention of pests, fires, some biodiversity and vitality) is a core objective in all forest management regardless of the property size.
59.	5.2.7 Pg 39	Last paragraph	These seem to be at a fairly high level for small forest owners. Are these Act abbreviations needed, if not used later in the report?	<p>The PEFC and ATFS requirements for the use of appropriate techniques and waste management and compliance with relevant national laws may be challenging to some forest owners, but they are fully doable if there is a willingness to invest in SFM.</p> <p>Abbreviations eliminated</p>
60.	5.2.10 Pg 39	Use of 'See above' – both here and wherever used in the report	It would be better to quote the requirement so as to avoid any doubt	Revised
61.	5.3.2	I 1.1.1	Would be more applicable if objectives included	ATFS Indicator 1.1.1 require that plans are

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	Pg 40		reference to economic (along with environmental and maybe social)	adaptive, embody land owners' objectives ... reflect current state of knowledge about natural resources and SFM. They do not specify consideration of market information or economic activities. The Standards formulation is applicable in management planning for private woodlots and it will include economic information as relevant.
62.	5.3.6 Pg 41, 1 <sup>st</sup> para		What above as its same text in box above? Better to provide the evidence ie PM 8.2?	Revised
63.	5.4.3 Pg 43	Standard 5, PM 5, I 5.1.2	It seems to be indirect or implied compliance as mostly its 'protect'	Standard 5, PM 5, I 5.1.2: <i>Forest management activities shall incorporate measures to protect identified threatened or endangered species on the property.</i> The word protect is interpreted in this assessment as to prohibit exploitation and to take measure to safeguard the vitality of species on a specific site. With this interpretation, the Standard is deemed to conform to PEFC requirement.
64.	5.4.8 Pg 44	'FORIs are defined by the ATFS and landowners.'	Where are they defined? I can understand an ATFS definition but it is hard to comprehend a landowner defining such values in a forest. Maybe could use PM 5.1 & 5.2 as well?	The AFF Standards PM 5.4 (Guidance) states <i>In an effort to support and facilitate identification of these resources, AFF developed the <b>Forests of Recognized Importance</b> Resource as a reference for <b>landowners</b> and <b>qualified natural resource professionals</b>. This resource is available at the <a href="#">ATFS website</a>. In addition, the AFF National Standards Interpretation Committee (NSIC) also advises consulting state forest action plans, state wildlife action plans and state natural heritage databases as resources for identifying <b>FORIs</b>. Due to the small <b>scale</b> and low-intensity of family forest operations, informal assessment for the occurrence of <b>FORIs</b> through consultation with experts or review of available</i>

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				<i>and accessible information is appropriate.</i> Definition of FORI is a new approach that contributes to the conformance with PEFC indicator 4.8.
65.	5.4.13 Pg 46	Standard 7, PM 7.1	As with 5.4.3, it seems to be implied or indirect	AFF standards 7.1 and 5.1 address the maintenance of BD. The standards focus on threatened species and location of special sites. They do not specify the measures, e.g. the desired level of decaying wood.  Thus, the AFF requirement is more general aiming at the target required by PEFC.
66.	5.5.2 Pg 46	Standard 7, PM 7.1	As per 5.4.3, the 'locate; must be interpreted for 'registered and mapped'	AFF standards give additional guidance on interpretation of each PM. Locate in this context is identification, with the assumption that it can be taken into consideration in management planning. Thus, the sites need to be recorded with site specific information in a relevant data base.
67.	5.5.4 Pg 47	'See above'	But which one?	Revised
68.	5.5.5 Pg 47	See above (5.5.3)	Why not insert PEFC requirement to clarify it?	Revised
69.	5.6.1 Pg 47	'The prologue of the standards The Standards are " <i>designed as a tool to help woodland owners be effective stewards of the land as they adaptively manage renewable resources; <u>promote environmental, economic and social benefits</u>; and work to increase public understanding of sustainable forestry</i> " ...'	This is not a PM – 'promote' must be demonstrated by planning as per the PEFC requirement	The PEFC requirements societal benefits, including new employment opportunities, are very strategic requirements to woodland owners. Such requirement cannot be placed as conditions for a small-holder, therefore AFF standards state that as a whole the SFM shall promote societal benefits.  Plans shall in their turn promote the Standards implementation.  This is a bit semantic issue, but Indufor concluded that AFF Standards deliver forest management that conforms to the requirement.

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70.	5.6.2 Pg 47	'See above'	While this is the direction from the prologue, it would be better as a PM	Revised
71.	5.6.4 Pg 48	Standard 5, PM 5.4  Comment – 1 <sup>st</sup> paragraph	I'm not sure how this relates to 5.6.4!  Which one? Is it the AFF Standards or one of the 8 standards from 7.1 of the main report?	Special sites FORI (PM 5.4.) relate to the customary rights and indigenous people's rights because these sites may be historical or cultural. They are often defined in a consultation process.  The second question is unclear to consultant
72.	5.6.6 Pg 49	Last paragraph	Wouldn't PM 5.4 or FORI be more applicable than using PEFC requirement 5.6.a especially with my comment?	PM 5.4. on forests of recognised importance FORI is added to the checklist
73.	PART IV Pg 55		Have defined Appendix 15 as 'ANAB Accreditation Rule' but in comments to 'Questions' don't use the title correctly. Also need to add 'Rule' to 1, 2, 4, 6, 14 and 16-22 to have the correct title of the document	Revised
74.	4. Pg 56	2 <sup>nd</sup> paragraph	A font issue with 'the' at start of 5 <sup>th</sup> line	Revised
75.	5. Pg 57	'SFI recognize chain of custody certificates ...'	Yes, but need to relate it to the AFF or to the ATFS please	Revised
76.	6. Pg 57	1 <sup>st</sup> paragraph	Is this enough as a part of the ATFS when it's the whole PEFC system in the requirement	The ANAB Accreditation Rules for CBs (ATFS scheme document) and its reference documents set requirements to gain understanding of ATFS and PEFC
77.	8. Pg 57	'See above question 7'	Really need to highlight that ISO 19011 is part of Appendix 15 as no mention in 7, only implied	Compliance with ISO 17021 is required by the ANAB rules. The standard also require that audit procedures are appropriate. ISO 19011 give the guidance for internal and external audits.
78.	22. Pg 61	'imply'	Isn't this 'require' or something similar?	Revised
79.	24. Pg 61		What of the second part of 24?	The ANAB rule also specifies the ATFS forest management, group certification standards that are the reference basis for certification

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				Added to Checklist: ATFS does not address directly chain of custody certification. The chain of custody certification of ATFS certificate holders will be done in line with the SFI procedures and international PEFC ST 2002:2013
80.	PART V Pg 62	'ATFs has adopted the international PEFC chain of custody standard.'	Is there any reference to whom and the date of adoption for the current PEFC CoC Standard?	Changed: However, ATFS documentation does not indicate when AFF has decided to adopt the standard PEFC ST 2002:2013 as the chain of custody standard. AFF shall specify the applicable standards in chain of custody certification.
81.	PREFACE Pg iv, 2 <sup>nd</sup> para	The report or its information may not be used for other purposes. PEFC Council has the right to publish the final version of the report on the Council's Internet site.	The report or its information may not be used for other purposes. PEFC Council has the right to publish the final version of the report on the <b>PEFC</b> Council's Internet site.	Copy right clause reformulated.



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