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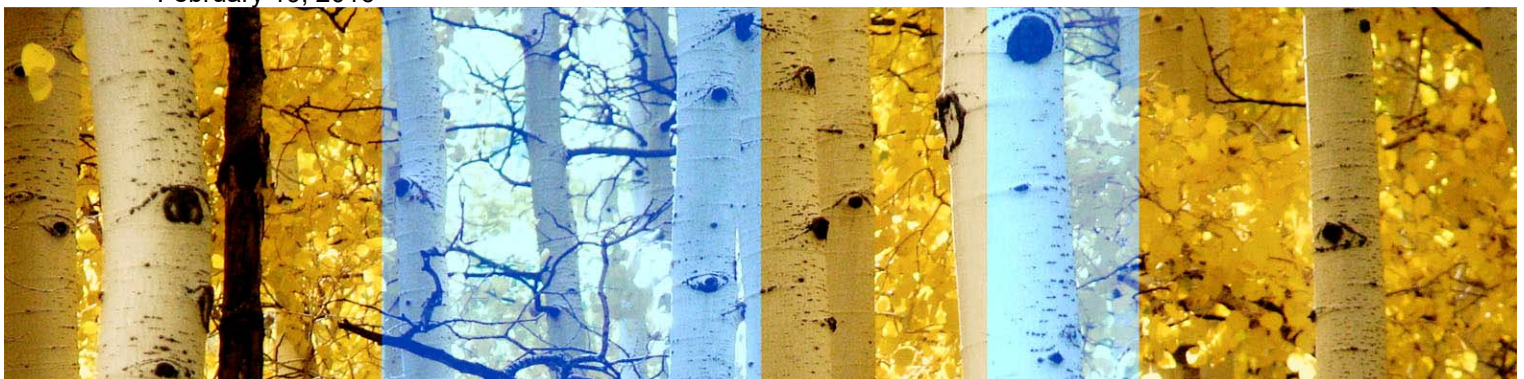
PEFC Council

Conformity Assessment of German Forest Certification Scheme for PEFC Endorsement

Final Report v 2

Helsinki, Finland
February 19, 2016

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ABBREVIATIONS

CB	Certification body
CoC	Chain of custody
C&I	Criteria and indicators
DAkKS	Deutsche Akkreditierungsstelle
ENGO	Environmental non-governmental organisation
EU	European Union
FSC	Forest Stewardship Council
FMU	Forest management unit
GDA	Joint German Occupational Safety and Health Strategy
GFCC	German Forest Certification Council
GFCS	German Forest Certification Scheme
IAF	International Accreditation Forum
IEC	International Electrotechnical Commission
ILO	International Labour Organisation
ISO	International Organization for Standardisation
MLA	Multi-Lateral Agreement
NGO	Non-governmental Organization
PEFC	Programme for the Endorsement of Forest Certification Schemes
PEFC D	German PEFC standard
PEFC GD	PEFC Guidance Document
PEFC IGD	PEFC Informative Guide
PEFC ST	PEFC Standard
PEOLG	Pan European Operational Level Guidelines
SFM	Sustainable forest management
WG	Working Group



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PREFACE

This report provides an independent conformity assessment on the revision of the German Forest Certification Scheme with the requirements of PEFC Council. The report is prepared to provide information for the PEFC Council for its decision on the potential re-endorsement of the German Forest Certification Scheme.

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 web site.

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1. INTRODUCTION

1.1 Objective and Scope of the Assessment

The German Forest Certification Scheme (GFCS) is owned and operated by PEFC Germany, founded in 1999. The German Forest Certification Council (GFCC) is an executive body of the PEFC Germany, responsible for, among others, appointing working groups, passing decisions on certification criteria and adopting system description. GFCC organized the periodic review of the GFCS starting from July 3, 2013 and the revised documents were adopted by the GFCC on November 26, 2014. The secretariat of the GFCC is referred to as PEFC Germany in this assessment. On February 10, 2015, PEFC Germany submitted the GFCS scheme to PEFC International for the re-endorsement process.

The objective of this conformity assessment is to verify the compliance of the revised GFCS scheme with international PEFC requirements. The assessment will cover GFCS procedures and processes for standard setting, scheme implementation, certification arrangements and performance requirements for sustainable forest management. The PEFC Germany also submitted standards on the management of Christmas tree plantations and recreational forests for the assessment.

The GFCS scheme has adopted the PEFC International chain of custody standard. The assessment will review that the chain of custody certification procedures in regional certification are in line with the PEFC certification and labelling requirements.

The assessment report will provide sufficient information as well as professional and objective conclusions on the compliance of different scheme elements with the PEFC requirements. The report will provide a basis for the decision-making process of the PEFC Council on possible re-endorsement of the German Forest Certification Scheme.

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 July – October 2014. No comments were received during the consultation.

2. National consultation of interested parties

Indufor sent out a questionnaire on standard setting process to 106 parties including invited and participating stakeholders, as well as to other relevant interest groups. PEFC Germany provided the original stakeholder contact list. 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.

The questionnaire was sent out on June 1, 2015 but only five replies were received. A compilation of the comments received during the consultation is presented in Table 12.1 and the detailed replies with questions are available in Appendix 3.

3. Desk study

The desk study on GFCS conformance was made against PEFC requirements using the PEFC Checklist (PEFC IGD 1007-01:2012) as a reference template and the references to GFCS documentations given by GFCC as a reference guide. Evidence on conformity was verified from the original GFCS or another document referred to by the PEFC Germany. In case where the referred document did not provide satisfactory evidence on the conformity to the PEFC requirement, other documents/sections were evaluated or the PEFC Germany was requested to provide additional information.



4. Elaboration of Draft Report

The Draft Report was sent to the PEFC Council on July 13, 2015 and with its permission to the GFCC. The Draft Report presents all the PEFC requirements that lack adequate evidence of conformance by the GFCS. The non-conformities were not classified into minor or major non-conformities at this stage.

The GFCC was requested to provide comments and further information by August 1, 2015.

5. Elaboration of the final draft report

The clarifications and additional information and documents that PEFC Germany provided on the non-conforming PEFC requirements were taken into consideration in the conclusions of this Final Report.

The Final Draft Report was sent to the PEFC Council on September 2, 2015, and the PEFC Council further 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 were taken into consideration when compiling this Final Report and are presented in Appendix 4 to this Final report.

7. Elaboration of the final report

The Final Report includes any changes and amendments that Indufor, in the role of independent assessor, deem relevant to include in the report. Appendix 4 gives justifications for the consideration of each one of the comments received from the Panel of Experts. The first version of the Final Report was sent to PEFC Council October 2015. This report is the second version of the Final Report where reported inconsistencies with PEFC requirements have been corrected.

1.3 Report Structure

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

Chapter 2 states Indufor's recommendation to the Board of the PEFC Council on the re-endorsement of the GFCS.

Chapter 3 describes a summary of findings and gives justifications for the Independent assessor's recommendation.

Chapter 4 presents the assessment method and material used.

Chapter 5 describes the structure of the GFCS

Chapter 6 describes the procedures for scheme revision and evaluates how the written procedures were implemented in the recent revision.

Chapter 7 assesses GFCS requirements for regional group certification and their compliance with PEFC requirements.

Chapter 8 describes the requirements of GFCS regional and forest management unit level standards in view of PEFC requirements.

Chapter 9 describes GFCS arrangements for chain of custody standard certification and gives an opinion of possible revision requirements.

Chapter 10 address the GFCS regulations on the use of the PEFC logo.

Chapter 11 reviews GFCS requirements for certification and accreditation procedures including notification of certification bodies.



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Chapter 12 reviews procedures for appeals and dispute resolution and their application in practice.

Chapter 13 summarizes the stakeholder comments received and explains their consideration in the assessment.

Appendices provide detailed information on the assessment. The most relevant is Appendix 1 describing Indufor conclusion on GFCS conformity to each PEFC requirement and lists the reference documents that provide the basis for the conclusion.



2. RECOMMENDATION

The recommendation of the Indufor is that PEFC Council endorses the revised German Forest Certification Scheme only after taking into consideration the following non-conformities. The major non-conformities should be corrected before the endorsement.

Major non-conformities:

1. In addition to the standards for regional and forest management unit (FMU) certification (PEFC D1001, PEFC D 1002-1 respectively), PEFC Germany submitted for the PEFC endorsement also the standards for Christmas tree plantations (PEFC D 1002-2) and recreational forests (PEFC D 1002-3). The latter two standards set additional requirements compared to regional and FMU level standards.

However, GFCS regional group certification and its group administration is not responsible for the certification procedures against the two special standards and the international PEFC program does not recognize separate certificates for Christmas tree plantations or recreational forests. A PEFC recognized certificate demonstrates compliance with sustainable forest management which in the GFCS is defined in the regional and FMU level standards.

Indufor suggests that the endorsement will not cover certification against the standards for recreational forests (PEFC D 1002-3) and Christmas tree plantations (PEFC D 1002-2). Thus certificates and PEFC labels shall make reference only to the regional and FMU level standards (PEFC D 1001 and PEFC D 1002-1).

2. The rules on lobo licensing (PEFC D 4006:2014) recognize certification of Christmas tree plantations and recreational forests eligible for a PEFC logo license. If they are not covered by the PEFC endorsement as suggested above the logo licensing rules shall be revised accordingly.
3. The GFCS does not ensure that a non-conformity per a forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner (PEFC ST 1002:2010).

Rules and contractual documents signed in group certification shall require information sharing on non-conformities between different certified regions.

Minor non-conformities:

4. The FMU level forest management standards (PEFC D 1001 and PEFC D 1002-1) do not have documented transition periods in the submitted standard documents.

See Chapter 3 for a summary of the assessment results and a detailed description on the identified non-conformities.



3. SUMMARY OF FINDINGS

3.1 General Scheme Structure

The GFCS is a well-structured scheme for forest and chain of custody certification. Forest management certification is operated as group certification at a regional level, usually at state (Bundesland) level. The standard for regional forest management certification (PEFC D 1001:2014) defines the responsibilities of group manager (regional working group) and participants (forest owners/managers) as well as information collection and monitoring obligations of group managers. PEFC D 1001 standard does not stipulate operational forest management requirements for regional or forest management unit (FMU) levels, but it outlines the principles and criteria that each region shall address in the regional action program for the improvement of sustainable forest management (see section 3.3)..

The regional certification delivers a statement on compliance with PEFC D 1001 and obliges the Regional Working Group to define operational and measurable objectives, which are achievable within a specific timeframe. The means to reach those objectives has to be described in regional action programmes that are followed up and updated regularly which establish regional level procedures for regular improvement of operations.

The document PEFC D 3001 on *Tool for the definition of objectives and action programmes* gives insight into the practical requirements of regional certification that complements the requirements forest owners/managers shall comply with at a FMU level. The PEFC D 3001 also describes how objectives and actions programmes shall be formulated.

FMU level requirements are stipulated in the standard for sustainable forest management (PEFC D 1002-1) that focus on operational requirements in wood production.

GFCS has special complementing standards for the management of Christmas tree plantations (PEFC D 1002-2) and recreational forests (PEFC D 1002-3). Certification of recreational forests or Christmas tree plantations is possible only if the forests are also part of a regional group certificate and their management complies with the regional and FMU level standards (PEFC D 1001 and PEFC D 1002-1). "Recreational" and "Christmas tree" certifications are FMU level certifications where participation in the regional certification is one of the requirements. However, the Regional Working Group has no responsibility for the certifications based on the two standards. Thus there is no assurance that group administration and internal monitoring cover "Recreational" and "Christmas tree" certifications. In addition, the international PEFC program does not recognize separate certificates for Christmas tree plantations or recreational forests and does not define their sustainable management. PEFC certificate demonstrates compliance with sustainable forest management which in the GFCS is defined in the regional and FMU level standards.

The current scheme structure with the options for special certification of Christmas tree plantations or recreational forests is not in compliance with the certification options of the international PEFC Council. This discrepancy is considered to be a major non-conformity.

Despite of this conclusion, the assessment analyses and reports on the documentation related to the management of Christmas tree plantations and recreational forests.

3.2 Standard Setting Procedures and Processes

Standard setting rules (procedures) are described in PEFC D 4001:2013 on standard revision procedures. The document sets solid requirements for organisation, administration and documentation, stakeholder participation, consensus building and possible appeals processes in a standardization process.

The implemented standard revision processes are described in the document *Revision of the German PEFC Scheme 2013-2014* (Dec. 23, 2014).



The standard for sustainable forest management at regional level (PEFC D 1001) was published on December 1, 2014 and it came into force on January 1, 2016 with a 13 month gap (PEFC allows a 12 month time gap). The FMU level standard PEFC D 1002-1 came into force on January 1, 2015, one month after its publication. The standard documents do not state a transition period within which they shall be applied in all certifications.

The one-month extension on the time between standard publication and application is well justified and noted only as a comment. However, the absence of specified transition periods in the two forest management standards is recorded as a minor non-conformity. All other procedures and implemented processes in standard setting comply with PEFC ST 1001:2010.

3.3 Group Certification

The GFCS does not ensure that non-conformity by the forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner (PEFC ST 1002:2010).

Self-commitment signed by forest owners participating in group certification requires a declaration that the forest owner has not been rejected from any other certification. This statement does not provide the evidence on the consideration of individual non-conformities between different certifications.

Only large scale forest owners (institutions, companies) are likely to have certified forests in two different group certifications.

The gap in information sharing on non-conformities between different group certifications is considered to be a major non-conformity to the PEFC ST PEFC ST 1002:2010.

3.4 Forest Management Standard

The regional (PEFC D 1001) and FMU level (1002-1) standards together set the requirements for forest management. The status of the standards for recreational forests (1002-3) and Christmas tree plantations (1002-2) is discussed under section 3.1.

The regional and FMU level standards and valid regulations set requirements for forest management that are in compliance with PEFC ST 1003:2010 on Sustainable Forest Management.

Requirements for forest management comply with PEFC ST 1003:2010 on Sustainable Forest Management.

3.5 Chain of Custody Standard

The GFCC has adopted the PEFC International standard (PEFC ST 2002:2013) for chain of custody certification in September 2, 2014. The Chain of custody of forest-based products – Specifications for PEFC Regional Label (PEFC D 2002-1) specify the recognized regions of origin and outlines the possible regional labelling claims.

GFCC provisions for chain of custody certification comply with PEFC ST 2002:2013 on Chain of Custody of Forest Based Products.

3.6 Logo Use

The logo licence contract stipulates that PEFC Logo Usage Rules apply to the issuance and use of the PEFC logo. PEFC Germany has adopted the PEFC Council international standard on logo use (PEFC ST 2001:2008 v2). In addition PEFC D 4006 sets regulations for the PEFC logo licensing and the use of scheme specific PEFC D label.



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The GFCS label includes claims on the origin of timber i.e. from a specific region or Christmas tree plantations and they are not part of the assessment.

The PEFC logo licensing procedures are aligned with PEFC requirements. However, the GFCS issues the logo licenses also against certifications of Christmas tree plantations and recreational forests which is not in line with the recommended scope of the endorsement (see section 3.1).

If the two types of certifications will not be covered by the PEFC endorsement, the logo licensing rules shall be revised accordingly. This is raised as a major non-conformity.

3.7 Certification and Accreditation Procedures

The GFCS requires that certification bodies shall be accredited in line with the requirements of International Accreditation Forum (IAF) and PEFC requirements. Standards (PEFC D 1003-1, 1003-2 and 1003-3) specify the requirements for bodies certifying against the standards for regional and sustainable forest management (PEFC D 1001 and 1002-1), Christmas tree plantations (1002-2) and recreational forests (1002-3). Notification requirements (PEFC D 4007) specify the acceptable accreditation conditions for forest management and chain of custody certification.

The German national accreditation body (DAkkS) accredits the certification bodies doing forest management certification. Certification bodies doing chain of custody certification shall be accredited by any accreditation body that is signatory to IAF (MLA), a requirement that is aligned with PEFC ST 2003:2012.

Certification and accreditation requirements comply with PEFC Council Technical Document Annex 6.

3.8 Notification of Certification Bodies

The GFCS notification procedures are defined in the standard PEFC D 4007:2014. The notification procedures apply to forest management certification against all forest management standards (PEFC D 1001, 1002-1, 1002-2, 1002-3) and to chain of custody certification against PEFC D ST 2002:2013.

Notification procedures comply with PEFC requirements as defined in PEFC GD 1004:2009 on Administration of PEFC Scheme and PEFC ST 2003:2012 on Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard.

3.9 Complaints and Dispute Resolution Procedures

Complaints procedures in regional working groups are defined in PEFC D 3003:2014 and for other complaints in PEFC D 4005:2014 on Dispute Settlement Procedures. The German PEFC governing body, GFCC, has a decisive role in accepting complaints for a grievance procedure and it relies mainly on the complainant to provide the relevant information for the decision-making.

The grievance procedures comply with PEFC requirements as defined in PEFC GD 1004:2009 and PEFC ST 1001:2010 on Standard Setting Requirements.

3.10 Summary of Comments Presented for PEFC Germany to Consider in Future GFCS Development

1. Internal monitoring in group certification PEFC ST 1002:2010 on Group Forest Management Certification, 4.1.2:

The GFCS does not disclose how regional working groups develop the action programme and monitor its implementation and how it is shared with forest owners. GFCS, with the support of regional groups, should share information with any interested



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forest owner to raise awareness of the system. Standard sets requirements for the procedures, but do not describe their implementation.

Also the role of certification of Christmas tree plantations and recreational forests in connection to regional group certification requires clarification. Especially the administrative responsibilities including internal monitoring need further specification.

2. Forest management requirements (PEFC ST 1003:2010):

The GFCS requires compliance with legislation. However, the standard should be more informative and specify the legislation relevant to environmentally, socially and economically sustainable forest management. Appropriate reference would also ensure that legal compliance is taken into consideration in regional and FMU level audits as appropriate. PEFC Germany provided the necessary legal references for this assessment.

3. The time period between the publication and application of the PEFC D 1001 standard was one month longer than PEFC rules allowed. GFCC gave a satisfactory justification for the prolongation of the period to the first day of the calendar year 2016.

4. Notification of certification bodies (PEFC D 4007:2014): GFCS should advocate transparency on disclosing the definition of fees for notification of certification bodies. Full transparency is not required but it would provide additional assurance on non-discriminatory procedures.



4. MATERIAL AND METHODS

4.1 PEFC's Documentation

The following PEFC International standards and normative guidelines set the requirements for compliance for the GFCS. The assessment reviews in detail the conformity of GFCS documented procedures and processes 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 (2nd 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
10. PEFC ST 2001:2008 v2, Logo Usage Rules.
11. PEFC Council Guideline 1005:2012, Logo Use Licenses by the PEFC Council (used as reference in drafting of PEFC D 4006)

Appeals and Grievance Procedures

12. Appeals procedures PEFC GD1004:2009, Administration of PEFC scheme, chapter 7, PEFC ST 1001:2010 Standard setting requirements, section 4.5.

The *PEFC Standard and System Requirement Checklist* (PEFC IGD 1007-01:2012) provides a template for detailed assessment of the GFCS's documentation for conformity to specific PEFC requirements.



4.2 GFCS Scheme Documentation

The assessment will be based on the following documentation of the GFCS (Table 4.1).

Table 4.1 GFCS Normative Documents Submitted for the Assessment

Document	Version
Certification arrangements and regional standard	
Regional forest management certification – Requirements.	PEFC D 1001:2014
Procedures and criteria for the endorsement of forest service enterprise certificates	PEFC D 4004:2014
Forest management standards	
PEFC standards for sustainable forest management.	PEFC D 1002-1:2014
PEFC standards for Christmas tree plantations on forest land.	PEFC D 1002-2:2014
PEFC standards for recreational forest.	PEFC D 1002-3:2014
Administrative standards	
Standard revision procedures	PEFC D 4001:2013
Statutes of PEFC Germany	PEFC D 4002:2010
Scale of fees	PEFC D 4003:2014
PEFC Logo Usage, licensing and labelling	
PEFC Regional logo usage rules – Requirements.	PEFC D 1004:2014
Issuance of licenses for PEFC logo usage and for [PEFC D] label usage	PEFC D 4006:2014
Requirements for Certification Bodies	
Requirements for bodies providing audits for regional certification.	PEFC D 1003-1:2014
Requirements for bodies providing audits for Christmas tree plantations on forest land.	PEFC D 1003-2:2014
Requirements for bodies providing audits for recreational forest.	PEFC D 1003-3:2014
PEFC Notification of certification bodies	PEFC D 4007:2014
Complaint and Grievance Procedures	
Dispute settlement procedures	PEFC D 4005:2014
Chain of Custody*	
Chain of Custody standard	PEFC D ST 2002:2013
Chain of custody specification for regional label	PEFC D 2002-1:2014
Chain of Custody of Forest Based Products – Certification Body Requirements	PEFC D ST 2003:2012

*Note: PEFC Germany has fully adopted PEFC's international chain of custody standard PEFC ST 2002:2013, Chain of Custody of Forest Based Products – Certification Body Requirements PEFC ST 2003:2012

The normative GFCS 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 GFCS documents (Table 4.2) describe the processes to be implemented in standard setting.



Table 4.2 GFCS Descriptive and Guiding Documents

Document	Version
The German forest certification scheme - System description	PEFC D 0001
Revision of the German PEFC scheme. 2013-2014. Standard revision report	Dec 23, 2014
Tool for the definition of objectives and action programmes (collection of examples).	PEFC D 3001:2014
Dispute settlement procedures for regional PEFC working groups.	PEFC D 3003:2014
PEFC Standard and System Requirement Checklist	PEFC IGD 1007-01:2012

The PEFC Checklist compiled by the PEFC Germany was used as a reference base to look at the specific evidence from the GFCS documentation.

4.3 Other Documents

Results of the Consultant's stakeholder survey to verify stakeholder invitation and participation in the forest management standard revision along with stakeholder views on process implementation.

4.4 Methods

The assessment was done as a desk study based on:

- the documentation listed above,
- the feedback received from the stakeholders and
- the additional clarification provided by the PEFC Germany.

Indufor sent a questionnaire on the standard setting process to 106 parties that were invited and/or participating in standard revision and to other relevant interest groups. The questionnaire is presented in Appendix 3. Only five replies were received.

This assessment presents the consultant's conclusion on the conformity of the GFCS with PEFC requirements based on the available evidence. Conformity to the PEFC requirements provides assurance 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"> - Stakeholder participation - Transparency - Consensus building - Consistency in planned procedures and in their implementation
Criteria for forest management (standard)	<ul style="list-style-type: none"> - Performance requirements - Practical applicability of the criteria considering natural conditions, forest tenure, organisational and administrative structures - Auditability of compliance with the criteria
Certification arrangements (group, individual and regional)	<ul style="list-style-type: none"> - Applicability and governance of planned arrangements - Reliability of arrangements to deliver full conformance to the scheme requirements - Methods to indicate certification status
Requirements for chain of custody certification and logo use	<ul style="list-style-type: none"> - Compatibility of the requirements with PEFC CoC standard - Rules for issuance and control of PEFC logo use within the scheme - Risks for unjustified use e.g. during transition of national certification to PEFC certification
Certification and accreditation procedures	<ul style="list-style-type: none"> - Requirements set for certification bodies and procedures: competence requirements, independence and impartiality - Applied procedures - Access for CBs to enter into the market - Compliance of scheme provisions with PEFC requirements - Availability of eligible accreditation body to provide the service

The results and conclusions on the conformity analysis are presented in detail in the assessment of GFCS against each requirement of PEFC Council Checklist (Appendix 1). 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.

The following grading of conformity levels will be used in the final draft report in the assessment (Box 4.1). The draft report does not downgrade any non-conformity to minor, with the exception of PEFC requirements Part I 6.3 and 6.4 on transition periods of revised standards.

Box 4.1 Assessment Scales Used in Conformity Evaluation

<p>Conformity</p> <p>A procedure described by the Scheme documentation fully meets the particular requirement of PEFC Council.</p> <p>Minor non-conformity</p> <p>A minor non-conformity 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 non-conformity should be corrected within 6 months. The assessor may recommend a longer period where justified by particular circumstances.</p> <p>Major non-conformity</p> <p>A major non-conformity violates the integrity of the certification Scheme and has to be corrected before the endorsement of the Scheme.</p> <p>NA</p> <p>Not applicable.</p>



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Only a positive conclusion on a conformity assessment was considered to meet the PEFC requirements. The Scheme elements assessed as minor or major non-conformities were classified as not meeting the performance level set for the endorsed Schemes.

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

Consultant may also present comments on GFCS documentation and propose improvements on the issues that cannot be classified as non-conformities but would improve the quality and clarity of GFCS documentation or implementation.

The assessment process is described in Section 1.2.



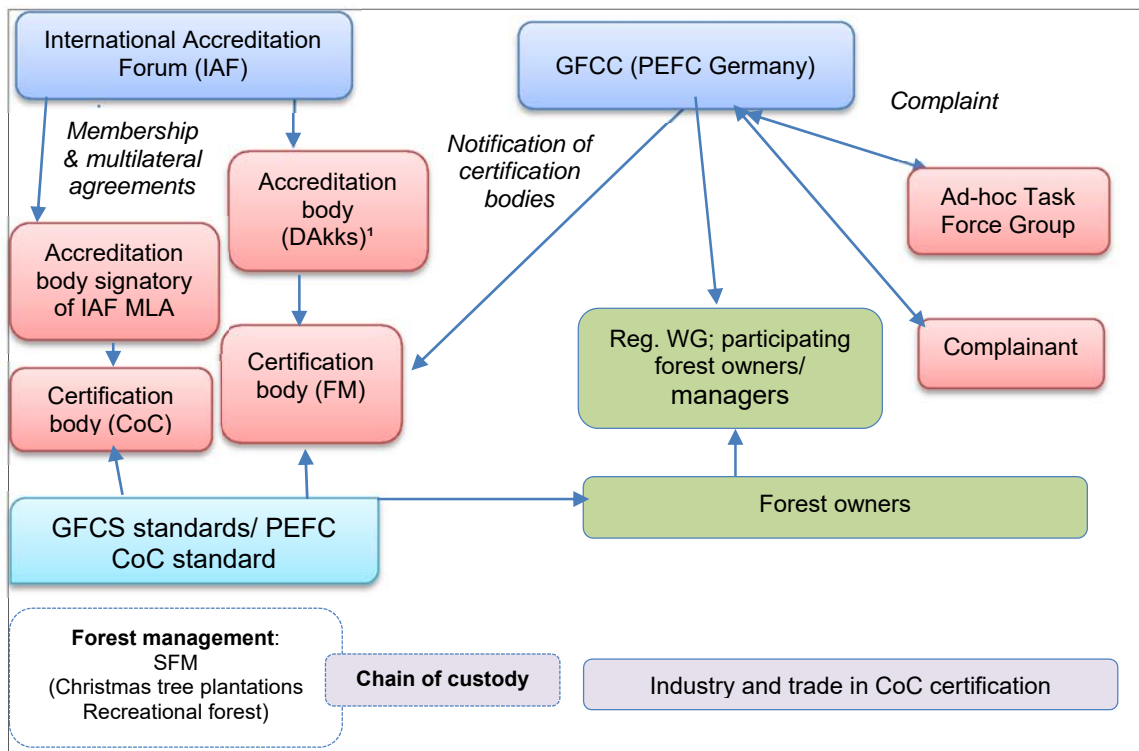
5. STRUCTURE OF THE GERMAN FOREST CERTIFICATION SCHEME

The German Forest Certification Council (GFCC) manages the German Forest Certification Scheme (GFCS). The GFCC submitted a regional forest certification standard and three forest management unit level standards for the assessment, i.e., (i) sustainable forest management, (ii) Christmas tree plantation and (iii) recreational forest management. Certification of recreational forests or Christmas tree plantations is possible only if the forests are also part of a regional group certificate and their management complies with the regional and FMU level standards. However, the Regional Working Group has no responsibility for FMU level certifications based on these two standards. Thus there is no assurance that group administration and internal monitoring would cover "Recreational" and "Christmas tree" certifications.

It is important to note that the international PEFC program does not recognize separate certificates for Christmas tree plantations or recreational forests. PEFC certificate demonstrates compliance with sustainable forest management which in the GFCS is defined in the regional and FMU level standards.

GFCS has adopted the PEFC International Standard (PEFC ST 2002:2013) as the chain of custody standard. Certification and accreditation bodies and procedures are independent from GFCS management apart from the obligation to become GFCC notified. Other scheme elements and functions are organised as presented in Figure 5.1.

Figure 5.1 Organisation of the German Forest Certification Scheme



¹ the Deutsche Akkreditierungsstelle (DAKks) serves as an accreditation body for FM certification and optionally also for chain of custody certification.



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Accreditation and certification processes in the GFCS are independent from scheme administration apart from the GFCC's right to list eligible certification bodies that comply with notification requirements. Accreditation requirements for forest management and chain of custody certification are slightly different but are aligned with the respective PEFC Council requirements.

All forest management certification is organised under regional group certification where regional working group takes the responsibility to provide assurance that forest management complies with regional forest management standard and that individual members comply with relevant forest management standards. Note that this obligation does not apply to the certification against the standards for Christmas tree plantations and recreational forests.

The scheme applies grievance procedures to address disputes in regional working group or certification members. Disputes that concern the activities of certification bodies are addressed by their grievance procedures as required by accreditation requirements.



6. STANDARD SETTING AND REVISION PROCEDURES

The GFCC has set defined procedures for standard setting. It is responsible for mapping of stakeholders, making a public announcement of the beginning of the standard setting process, sending out an invitation to stakeholders, organizing public consultations, and ensuring formal approval and publication of the standards.

The standard setting documents (Table 4.1 and Table 6.1) define in detail the procedures and processes. The standards for forest management shall be revised once in every five years.

Table 6.1 Documentation Guiding PEFC Germany’s Standard Setting

Document	Purpose
Statutes of PEFC Germany (PEFC D 4002)	Defines the GFCC’s role in standard setting and approval According to § 6 Nr. 2f, the GFCC is responsible for “deciding on certification criteria and indicators for sustainable forest management as well as on the description of the system”. Furthermore, it sets up working groups, assigns their members and determines the chairperson of the working groups (§ 6 No. 2j). Consequently, the GFCC also authorizes the commencement and the time schedule of the revision process.
Standard revision procedures (PEFC D 4001:2013)	Defines procedures for standard revision in the different stages of revision and approval process. It also refers to additional relevant normative and voluntary guidelines

GFCC is responsible for launching and organising standard setting with the assistance of German PEFC secretary. Working groups may be established for the standard drafting but the approval decision is made by the GFCC. The GFCC has listed ten interest categories that shall be represented in the standard setting working group (WG) that drafts the criteria and indicators for regional and FMU level standards (PEFC D 1001 and 1002-1).

The following interests groups should have a balanced participation in the WG include (PEFC D 4001:2013):

1. Private forestry
2. State forestry
3. Communal forestry
4. Timber, pulp and paper industry, including trade
5. Environmental Non Governmental Organisations (NGO)
6. Trade Unions
7. Other forestry related organisations (German Forestry Council, Agricultural Chambers)
8. Other user groups (consumer organisation, tourism associations)
9. Forest service enterprises
10. Science.

The standard setting procedures respect transparency in information and record keeping. As required by the PEFC Council, the current procedures include an option to consult on the planned revision procedures prior to their application.

The GFCC approves the nomination of members to the WG, which does not fully respect the PEFC requirement on the full accessibility of affected stakeholders to standard setting. However, the listed ten interest categories include practically all possible materially affected stakeholder categories in the country. This in practice, provides an access to all interested organisations to participate. The GFCC also aims at a balanced representation and need to control the number of participants from the highly represented interest groups. Voting rules,



where each interest category have four votes at a maximum, also contribute to a balanced decision making.

The GFCC shall provide information on standard setting in public media and contact directly key stakeholders that have a significant role in a balanced representation (e.g. ENGOs) or have refused to participate in the previous scheme revision.

PEFC Germany claims that there are no disadvantaged stakeholders in Germany. In the scope of the stakeholder mapping PEFC Germany identified 518 stakeholders and none of them has been identified as "disadvantaged" in terms of language and/or financial/human resources.

The WG documentation and decision-making procedures are well described. The GFCS dispute settlement procedures also apply to standard setting. If a non-conformity was raised to address an issue, it is the complainant's full responsibility to provide all necessary information for impartial decision making by the independent task force set up for the grievance procedure.

Transparency in the WG is maintained by posting relevant material on the website of the PEFC Germany (www.pefc.de) and by sharing all minutes with the members by email. For the public the different stages of the revision process were communicated through Internet, articles and stakeholder seminars (Wurtzburg). Public consultation of the draft standards (regional and SFM) was carried out in July-October 2014 as appropriate.

The working groups aimed at consensus decisions aligned with the ISO and PEFC definition on consensus.

6.1.1 Revision of Forest Management Standard

The standard setting processes for the revision of forest management standards (PEFC D 1002-1, 1002-2, 1002-3 for sustainable forest management, Christmas tree plantations and recreational forest respectively) are described in the report on *Revision of the German PEFC Scheme 2013-2014* (Dec 23, 2014). It documents the different stages of the revision process.

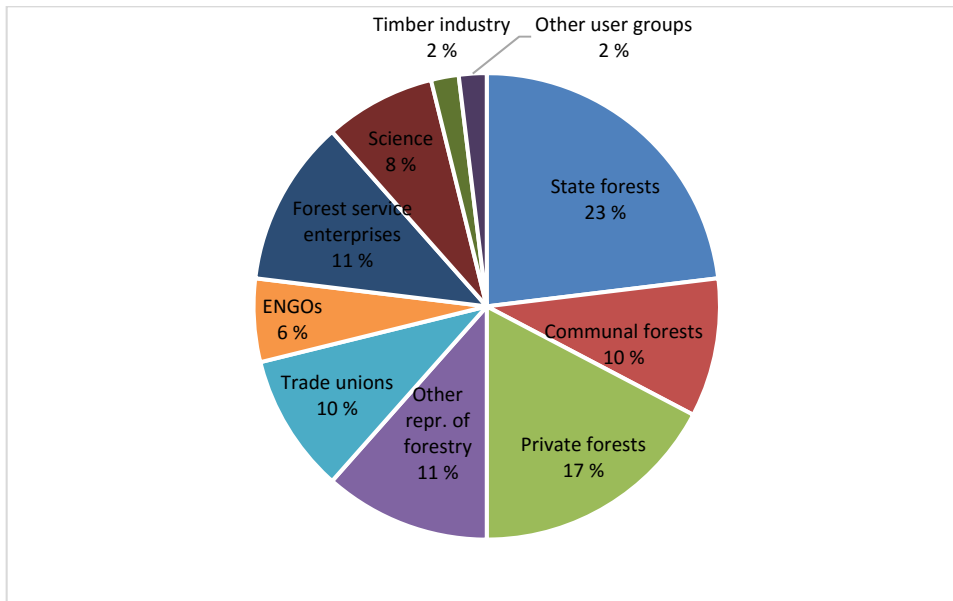
The standard setting was launched on July 3, 2013 when GFCC had a meeting and set a timeline for the revision process. On August 8, 2013 a printed letter was sent to parties relevant for the revision process and two weeks later, an online invitation to join the workshop was posted on the PEFC Germany's website. A stakeholder workshop where the working agenda was introduced took place on September 17, 2013. Ten days later a letter was sent to 61 stakeholders including the members of regional working groups asking them to appoint their representatives to working groups in addition to communicating the same message via a press release published on www.pefc.de. Key stakeholders (29 organisations) listed in the standard revision report were contacted personally whenever possible.

The composition of the working groups on "Standards" and "Procedures" were approved by the GFCC in November 2013 and the first constitutive meeting was held on November 27, 2013. The working group "Standards" had 52 members, whereas the working group "Procedures" had 17 members. The documentation did not record refusal of any member applications. (Figure 6.1).

The working group on Standards had four meetings between November 27, 2013 and October 21, 2014 when it made a consensus decision on the revised forest management standards.



Figure 6.1 Share of Different Interest Groups in Standard Setting Working Group



The first drafts of standards became available for public consultations – the information about it was announced via a PEFC Germany’s newsletter and a press release published on its website. The public workshop – “Wurzberg+15” took place on July 2, 2014 and 83 people took part in it. The workshop was followed by the online consultations taking place between August 4 and October 3, 2014. Final drafts of the revised documentation received a consensus approval by the Working Group on November 12, 2014 and were presented to the GFCC on November 26, 2014.

The final scheme documents approved by the GFCC became freely available at the PEFC Germany’s website www.pefc.de in December 2014. The regional standard (PEFC D 1001) came into force on January 1, 2016 and the FMU level SFM standard (PEFC D 1002-1) on January 1, 2015. The two standards do not describe the transition periods for the standard implementation, which is recorded as a minor non-conformity.

6.1.2 Chain of Custody Standard Development and Labelling

PEFC Germany has adopted PEFC’s international chain of custody standard (PEFC ST 2002:2013) on September 2, 2014.

Accordingly, the GFCS applies PEFC requirements on labelling (PEFC ST 2001:2008 v2) and has specified the conditions for using regional claims in the standard PEFC D 2002-1 on *Chain of Custody Specification for Regional Labels*. The standard complements the PEFC chain of custody standard with additional specifications:

- claim to be used in regional certification
- origin of categories
- lists possible geographic regions
- requires physical separation.



7. GROUP CERTIFICATION ARRANGEMENTS

The GFCS scheme recognizes regional group certification of forest owners at a state (Bundesland) level. The standard for regional forest management certification (PEFC D 1001:2014) define the responsibilities of the group manager (regional working group) and participants (forest owners/managers) as well as information collection and monitoring obligations of group managers. PEFC D 1001 standard does not stipulate operational forest management requirements for regional or forest management unit (FMU) levels, but it requires regions to develop regional action programmes for the improvement of sustainable forest management. The standard PEFC D 3001 on “Tools for the definition of objectives and action programmes specify the detailed and practical elements of SFM an action programme must address and often specify required quantitative thresholds for certifiable forest management.

FMU level requirements are stipulated in the standard for sustainable forest management (PEFC D 1002-1) that focus on operational requirements in wood production. The standard does not cover the full scope of environmental and social requirements and thus does not alone comply with PEFC requirements for forest management.

Forest owners and managers wishing to certify their forests shall join a regional group and sign a voluntary self-commitment presented in Appendix 2 to the standard PEFC D 1001:2014. Forest owners may also join a regional group through forest owners' associations that make the self-commitment. The forest owners participating directly or through their association must comply with the PEFC requirements set for group certification (Box 7.1).

Box 7.1 Obligations of Forest Owners in Regional Forest Certification

To take part in the regional certification, I will comply with the requirements of PEFC D 1001. I will fully cooperate with and support the regional working group and the certification body, effectively answer their questions regarding relevant data, documentation and other information, allow access to my forests and other facilities where necessary for internal and external audits or other relevant assessments. Furthermore, I will implement measures defined in the regional action plan relevant to the participants of the regional certification; I will also implement relevant corrective and preventive measures imposed by the regional working group.

I agree that the details on my forest property given above are forwarded to the respective registration body and certification body and published by them.

I assert that I have not been rejected from a certification scheme.

In the usage of the PEFC logo, I will comply with the PEFC Logo usage rules PEFC D ST 2001 and with the logo usage contract with PEFC Germany.

Source: PEFC D 1001:2014 Appendix 2

Group certification is possible only under regional certification and participation in regional certification is a precondition for certification of Christmas tree plantations or recreational forests. The contracts for self-commitment require compliance only with the standard for sustainable forest management (PEFC D 1002-1) and do not refer to certification of Christmas tree plantations or recreational forests. In fact the regional WG administrating regional group certification is not responsible for issues related to certification against Christmas tree or recreational forests. The scheme shall clarify the contractual role of certification of Christmas tree plantations or recreational forests in-group certification if these certifications intend to be part of regional group certification.

The unclear status of certification of Christmas tree and recreational forests within the regional group administration and among the certifications recognized by the PEFC Council result that they should not be included in the scope of the PEFC endorsed forest



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certification scheme. This issues is raised as a major non-conformity (See section 5.1 for further information).

PEFC requires that any non-conformity identified in one PEFC forest certification be informed to any other PEFC certification that a forest owner is part of. GFCS emphasizes that forest owners should belong to only one regional forest certification, but the scheme also includes an option to divide a forest property between two regions (PEFC D 1001 4.5). Self-commitment requires a declaration that the forest owner has not been rejected from any certification, but that requirement does not provide the evidence on consideration of individual non-conformities between different certifications. **The absence of information sharing on non-conformities of one forest owner who have forests under several regional certificates is raised as a major non-conformity.**

The responsibilities of regional group are well defined, but the standard gives little guidance on the formulation of the written management procedures by the different regional working groups. Regional working groups have a crucial role in assuring that the members comply with certification requirements at regional and FMU levels. They have also the mandate to exclude a participant from the regional certification in case of persisting non-conformities to the regional or FMU level standards (PEFC D 1001 and PEFC D 1002-1).

The management procedures or other relevant commitment shall also describe the procedures to exclude a member from regional certification. The procedures are not defined in the self-commitments.



8. FOREST MANAGEMENT STANDARD

8.1 General Remarks

The standard for regional forest management (PEFC D 1001:2014) defines the responsibilities of regional working groups and obliges them to specify operational and measurable objectives for forest management in Regional forest programs and related action plans. Action plans describe procedures and responsibilities to comply with these objectives within a given period.

The GFCS requirements for regional certification are based on Pan European Operational Level Guidelines (PEOLG) and European criteria and indicators (C&I) for SFM that outline the objectives for Regional forest programmes and action plans. The regional standard does not write out the applied international PEOLG or C&I, which should be the case in order to provide assurance that regional operators and public would be well informed on the baseline requirements.

As such, the regional requirements for forest management (PEFC D 1001, Annex 1 list of indicators) do not describe clear and auditable objectives. However, regional forest programmes specify the objectives (comparable to criteria) and their implementation to a level that is auditable. The standard PEFC D 3001 *Tool for the definition of objectives and action programmes* provides guidance on development of regional forest programmes and action programmes.

The regional forest programmes (>30 in total) and related management objectives vary in content and performance requirements between the regions; therefore, the GFCS encompasses a range of different regional requirements that are not subject to this assessment. This assessment focuses on the general framework requirements for regional certification.

The FMU level forest management standards are PEFC D 1002-1 for sustainable forest management SFM; PEFC D 1002-2 for Christmas tree plantation and PEFC D 1002-3 for recreational forest. The PEFC D 1002-1 standard is the baseline standard that applies in production forests and recreational forests and also to Christmas tree plantations (PEFC D 1002-2).

The detailed description of standards' conformity with specific PEFC requirement is presented in Appendix 1. Chapter 8.2 presents a summary on the compliance of forest management standards with the PEFC requirements.

8.2 Analysis Results

General requirements:

The GFCS requirements for sustainable forest management at regional and FMU levels, including management of recreational and Christmas tree plantations, set management and performance requirements that comply with respective PEFC requirements of PEFC ST 1003:2010. The standards (PEFC D 1001, 1002-1, 1002-2 and 1002-3) together apply to all types of forests in Germany including plantation and natural forests.

Applicants for certification of Christmas tree plantations and recreational forests shall also be members of regional certification and comply with relevant parts with the FMU level standard 1002-1. However, a non-conformity with either of these standards is not taken into account in regional group certification.

8.2.1 Criterion 1 - Enhancement of forest resources and their contribution to the global carbon cycle

The regional level requirements for forest management planning are generic, mostly repeating the PEFC requirements. The generic requirements outline regional forest programmes that specify planning targets for economically, environmental and socially sustainable management.



SFM standard requires a management plan for all forest holdings that exceed 100 hectares in size and smaller entities shall compile information on forest stock and state the management targets. The specific requirements for planning are quite generic especially on consideration of environmental and social aspects and impacts. These are largely taken into account through legal compliance to the regulations on forest management of production forests or forests under different protection categories in Germany.

In Germany forest management, plans are revised once in every ten years. In addition, revision of forest programme initiate the review of any revision needs in regional forest programmes and consequently action programmes.

Conversion of forest land to other land uses is regulated by legislation on land use planning. Legislation also requires offsetting cleared forest area with comparable afforestation area. In addition to the normative restrictions on forest conversion, FMU level standard prohibit clearance of any valuable sites. Forest conversion is not a problematic issue in the German forestry.

GFCS complies with the requirements of Criterion 1 of PEFC ST 1003:2020.

8.2.2 Criterion 2 – Maintenance of Forest Ecosystem Health and Vitality

The regional standard (PEFC D 1001) sets generic requirements for the maintenance and monitoring of ecosystem health. The FMU level standard (PEFC D 1002-1) addresses the maintenance of natural structures in forests and refers to restrictions on clear cutting. It also requires growing of native and adapted species, restricts the use of exotic species, and ensures that necessary precautionary measures shall be taken prior to their use. Annual monitoring/auditing and periodic revision of the regional programme and related action programme integrate the monitoring of biotic and abiotic damages into the requirements or regional certification.

Regarding chemical use, the standards require minimising the use of pesticides. They rely on EU and related national legislation (*Pflanzenschutzgesetz (Federal Plant Protection Law)*) on any restrictions on use of pesticides as well as rules for the appropriate application methods. The authorities publish a list of authorized plant protection products in forestry¹.

Chemical use is more liberal in Christmas tree plantations compared to the traditional wood production. Yet the standard PEFC D 1002-3 requires that chemical use is below the normative level.

GFCS complies with the requirements of Criterion 2 of PEFC ST 1003:2010.

8.2.3 Criterion 3 – Maintenance and Encouragement of Productive Functions of Forests

Regional standard states that forest management shall maintain and improve forest resources and provide diversified output with high added value. Management methods shall be economically, socially and environmentally viable and avoid causing damage to the production capacity or harvesting in excess of production capacity.

At the FMU level, the standard specifies forest managers' responsibilities on planning and appropriate tending.

The standard does not set planning or monitoring requirements for non-wood forest products as there is not a specific need for it and they are not traded as certified products. The standard is not applicable to hunting and fishing that are regulated, monitored and controlled by the state.

1

http://www.bvl.bund.de/SharedDocs/Downloads/04_Pflanzenschutzmittel/psm_verz_4.pdf?__blob=publicationFile



The regional and FMU level standards encourage the development of adequate infrastructure for forestry purposes and to maintain infrastructure for recreational forests in a good condition.

GFCS complies with the requirements of Criterion 3 of PEFC ST 1003:2020.

8.2.4 Criterion 4 – Enhancement of Biological Diversity

Regional standard set generic requirements for considering biological biodiversity in forest management planning. The standard does not specifically emphasise a landscape level approach required in many PEFC requirements but the regional forest programme sets objectives that are applicable at a scale larger than a FMU. Monitoring of regional forest programme also address landscape level improvements.

GFCS contributes to the maintenance of ecological connectivity through restrictions on clear cutting with an objective to maintain a closed canopy cover. The nature protection legislation, including Natura 2000 Programme also increases ecological connectivity with a network of protected areas.

FMU level SFM standard address the biological diversity through the requirements to promote mixed stands, growing of rare tree species and increasing the quantity of decaying wood. It also requires consideration of protected biotopes in forest management planning. The SFM standard is more specific on setting requirements for harvesting and regeneration. Forest managers shall prefer natural regeneration when possible.

Legislation prohibits the exploitation of protected species for commercial purposes.

The FMU level SFM and Christmas tree plantation standards prohibit the use of genetically modified trees. The EU level regulations on the release of GMO trees also prohibit their commercial use.

All standards emphasize the minimization of damages to forest stands or soil caused by harvesting or infrastructure development.

GFCS complies with the requirements of Criterion 4 of PEFC ST 1003:2020.

8.2.5 Criterion 5 - Enhancement of Protective Functions in Forest Management

Legislation and regional standard set the overall requirements on mapping, registration and consideration of sensitive forest areas in forest management planning and operations. The formulation of the standard requirements follow closely the structure and content of the generic PEFC requirements.

FMU level standards (PEFC D 1002-1 and 1002-3 for recreational forests) oblige forest managers to take into account all protective functions identified at regional level (including formal classification based on law or at regional standard. Special emphasis is on the protection of water sources and soil and avoidance of damages from harvesting or infrastructure development.

Clear cutting is strongly restricted resulting that skidding cause the main risk for soil damage. The FMU level standards set detailed requirements to minimize any skidding damages (PEFC D 1002-1 Ch. 2.5-2.6).

The regional or FMU level standards do not set specific requirements for the periodic monitoring of forest health, but a periodic revision of the regional plan and related action programme integrate monitoring and planning of measures to improve forest health into regional and FMU level requirements.

GFCS complies with the requirements of Criterion 5 of PEFC ST 1003:2020.



8.2.6 Criterion 6 - Maintenance of Socio-Economic Functions

Many of the requirements on social well-being and property rights are governed by federal and state legislation and regulations in Germany. The standards do not refer to the range of relevant laws and regulations that somewhat vary between the states.

The regional and FMU level standards focus strongly on labour issues with an emphasis on safety and training. Labour laws that all certified forest managers shall comply with protect workers' rights.

Forest owners are responsible for surveying and identifying the culturally and ecologically valuable sites on their properties. FMU level standards require further the consideration of recreational values that are of high importance in Germany. By law, people have access to forests for recreational purposes.

Germany has ratified most of the core ILO conventions (Table 8.1) and thus the content of those conventions is translated into national legislation. However, Germany has not ratified the Convention on Indigenous and Tribal People (C169), as there are no indigenous people in Germany, nor the Convention on Occupational Safety and Health (C155). The latter has been substituted by national acts (such as Maternity Protection Act; Ordinance on Maternity Protection at the Workplace; Young Workers Protection Act; Working Time Act; Act on the Payment of Child Raising Benefit and Child Raising Leave; Insolvency Ordinance). The Joint German Occupational Safety and Health Strategy (GDA) – a common initiative of the government, federal states and accident insurance institutions complements the normative requirements.

The regional and FMU level standards are not very informative to forest owners, managers implementing the standard or other parties interested in knowing about its requirements as they do not make reference to the relevant legislation or write out the basic requirement of the convention.

Table 8.1 Ratification Status of Selected ILO Conventions in Germany

Fundamental ILO Conventions Number	Name and Year	Status in Germany
ILO No 29	Forced Labour, 1930	13 Jun 1956
ILO No 87	Freedom of Association and Protection of the Right to Organize, 1948	20 Mar 1957
ILO No 98	Right to Organize and Collective Bargaining, 1949	08 Jun 1956
ILO No 100	Equal Remuneration, 1951	08 Jun 1956
ILO No 105	Abolition of Forced Labour, 1957	22 Jun 1959
ILO No 111	Discrimination (Employment and Occupation) 1958	15 Jun 1961
ILO No 138	Minimum Age for Admission to Employment, 1973	08 Apr 1976
ILO No 182	Worst Forms of Child Labour Convention, 1999	18 Apr 2002
Other ILO Conventions referred by PEFC Council		
ILO No 155	Occupational Safety and Health Convention, 1981	Not ratified
ILO No 169	Indigenous and Tribal People's Convention, 1989	Not ratified

Source: http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102643

GFCS complies with the requirements of Criterion 6 of PEFC ST 1003:2020.



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8.2.7 Criterion 7 - Legal Compliance

Forest legislation in Germany is mainly state specific (regional), i.e. information on legislation differs between the 16 federal states. This fact is taken into account by the GFCS e.g. in the regional standard PEFC D 1001, Ch. 7.1.2.1.1 that requires information and guidance to be provided to participants (on implementation of PEFC D 1002-1). Regional group entity has the responsibility to assure that participants are aware of applicable legislation.

The standards do not specify any measures at regional or FMU levels for the prevention of unauthorised activities. However, Germany has a strong law enforcement structure and capacity to efficiently control and enforce unauthorised and illegal activities by third parties (others than forest owners). The role of those authorities in law enforcement is exclusive.

The GFCS requires compliance with legislation. However, the standard should be more informative and specify the legislation relevant to environmentally, socially and economically sustainable forest management. Appropriate reference would also ensure that legal compliance is taken into consideration at regional and FMU level audits as appropriate.

GFCS complies with the requirements of Criterion 7 of PEFC ST 1003:2020.



9. CHAIN OF CUSTODY CERTIFICATION

The GFCS has adopted the PEFC International standard for chain of custody certification (PEFC D 2002:2013). It does not have a scheme specific chain of custody standard. **The PEFC D 2002-1:2014 standard on *Chain of Custody of forest-based products - Specifications for PEFC Regional Label* specify the regional origin categories and potential claims on certification.** The standard specifies the claims and allowable origin categories of material.

10. PEFC LOGO USAGE

10.1 GFCS Requirements on Logo Usage

10.1.1 General

GFCS applies the international PEFC chain of custody standard (PEFC ST 2002:2013) and thus it is obliged to ensure that certification bodies comply with the PEFC standard 2003:2012 which sets requirements for certification bodies undertaking chain of custody certification. These requirements include obligations to control logo usage (see PEFC ST 2003:2012 Ch. 7.4). GFCS along with the PEFC standard require compliance with ISO 17021 standard on requirements for certification bodies that also require the control of statements (incl. labels) related to the issued certificate (see ISO 17021² Ch. 8.4).

The GFCC authorizes licenses for use the PEFC logo (owned by PEFC Council) and German PEFC label (owned by GFCC). Concerning the PEFC logo, the GFCS requirements are based on PEFC D 2001:2008³ (Logo Usage Rules), PEFC D 4006 (Logo licensing) and PEFC GD 1004:2009 (Administration of PEFC Scheme) (Table 10.1). In addition, the GFCS specifies the regional logo usage rules in the standard PEFC D 1004:2014.

Table 10.1 Standards Guiding Logo Use

Document	Purpose
Relevant to the use of PEFC Logo with approved claims	
PEFC ST 2001:2008 v2 identical to PEFC D 2001	PEFC International rules for labelling
PEFC D 4006:2014	Describes the procedures for the Issuance of licenses for PEFC logo usage and for [PEFC D] label usage
Relevant to the use of GFCS labels of origin	
PEFC D 2002-1	The standard specifies the regions of origin and the claim of regional label
PEFC D 1003-2:2014 PEFC D 1003-3:2014	Define claims to be used for labels for certified Christmas tree plantations and recreational forests respectively.
PEFC D 1004:2014	Regional logo use rules

The PEFC D 4006 standard recognize the following forest management certifications as the basis for a logo license: regional certificate issued against regional and FMU level standards of

² ISO 17021:2007 Conformity assessment. Requirements for bodies providing audit and certification of management systems

³ A translation of the International PEFC ST 2001:2008 v2



PEFC D 1002-1, 1002-2 (Christmas tree plantations) and 1002-3 (recreational forests). The assessor recommends that the latter two types of certifications are not part of the endorsement decisions and consequently should not be eligible for the use of PEFC logo (see sections 2, 3.1, 5). This issue linked with the final decision on the scope of the endorsement, is raised as a major non-conformity.

According to PEFC D 4006:2014 an entity applying for the PEFC logo usage license shall:

- a) be a natural person or legal entity
- b) agree that PEFC Germany collects and makes publicly available the entity's identification and other information as specified by PEFC Germany
- c) sign the PEFC Logo Use Contract with PEFC Germany.

Logo use licenses are issued only to entities that are registered in Germany.

The license agreement shall clearly define the extent to which the logo may be used, i.e. the logo user group as well as the scope of PEFC logo. In addition, the logo user shall be committed by the agreement to conform to the logo rules (PEFC D ST 2001) of the PEFC logo.

Special requirements include possession of a valid forest management certificate (PEFC D 1002-1:2014, 1002-2:2014 or 1002-3:2014) for the user group B, a valid chain of custody certificate (PEFC D ST 2002:2013) for a user group C and identification of purposes of the PEFC logo use with no conflict to objectives of PEFC Germany/PEFC Council for user group D. PEFC Germany approves the decision on the issuance of a logo license.

Where necessary, the logo user shall inform PEFC Germany about the usage of the logo/ label, which is verified by (in the case of user groups B and C) the respective certification body.

The GFCS uses labels with claims on origin of wood/forest (region, Christmas tree plantation or recreational forests). These labels are a combination of GFCS label and PEFC label presented without a claim (only with license number). The assessor considers this label as a GFCS specific label that are not addressed in the assessment. However, the PEFC label licences referred to in the regional context or in certification of Christmas trees and recreational forests shall be based on PEFC recognized regional certificates. Uncertainty on this issue is raised as a non-conformity.

10.1.2 GFCS Labels

At regional level, the standard PEFC D 2002-1 on requires that an organisation establishes a chain of custody to use the claim *Regional wood from [name of the region]* on PEFC Regional certified material. The requirements with the standards are used together with PEFC chain of custody standard (PEFC D 2002:2013 in the GFCS).

In addition the GFCS has normative documents for bodies providing audits for Christmas tree plantations on forest land (PEFC D 1003-2:2014) and for recreational forests (PEFC D 1003:2014). These standards define among other, the allowed claims related to the respective certifications.

Proposed claims in GFCS standards		PEFC ST 2001:
PEFC D 1003-1	none	on-product: PEFC Certified <i>This product (or product name) is from sustainably managed forests, recycled and controlled sources</i>
PEFC D 2002-1	<i>Regional wood from (name of the region)</i>	PEFC recycled
PEFC D 1003-2	<i>This Christmas tree plantation is PEFC certified / This Christmas tree originates from PEFC certified plantation</i>	<i>This product or product name) is from recycled and controlled sources</i>
PEFC D 1003-3	<i>This recreational forest is PEFC certified</i>	off-product: <i>Promoting sustainable forest management</i>



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10.2 Results

Compliance with the international PEFC standards on chain of custody certification and requirements for certification bodies undertaking chain of custody audits oblige certification bodies to control logo use in line with PEFC requirements.

The PEFC logo licensing procedures are aligned with PEFC requirements.

The assessor recommends that certification of Christmas tree plantations and recreational forests is not part of the endorsement decisions and consequently should not be eligible for the use of PEFC logo (see sections 2, 3.1, 5). This issue linked with the final decision on the scope of the endorsement, is raised as a major non-conformity.

The scheme specific PEFC D labels of origin are not covered by the assessment.



11. CERTIFICATION AND ACCREDITATION PROCEDURES

11.1 GFCS Requirements for Certification and Accreditation

The GFCS requirements for certification and accreditation in forest management are stated in the documents listed below (Table 11.1). In chain of custody certification, the GFCS applies the PEFC standard PEFC ST 2003:2012 as required when certifying against the international PEFC chain of custody standard PEFC ST 2003:2012.

Table 11.1 GFCS Accreditation Requirements for Certification Bodies

Document	Version
Requirements for bodies providing audits for regional certification	PEFC D 1003-1:2014
Requirements for bodies providing audits for Christmas tree plantations on forest land	PEFC D 1003-2:2014
Requirements for bodies providing audits for recreational forest	PEFC D 1003-3:2014
Certification Body Requirements – Chain of Custody	PEFC ST 2003:2012
PEFC Notification of certification bodies	PEFC D 4007:201

The standard PEFC D 1003-1 sets the accreditation requirements for forest management certification. The special standards for Christmas tree plantations and recreational forests give additional specifications for applicants, certification process and claims accepted by GFCS.

Box 11.1 GFCS Requirements for Accreditation of Certification Bodies for Forest Management Certification

According to PEFC D 1003-1 (Appendix 1) Certification bodies operating forest management certification according to the German PEFC scheme shall have valid accreditation issued by the national accreditation body of Germany (DAkkS) which complies with ISO/IEC 17011:2004.

The scope of the accreditation shall explicitly cover PEFC D 1001, PEFC D 1002-1, PEFC D 1002-2 and PEFC D 1002-3 in its valid version and/ or with reference to any future amendments adopted by PEFC Germany.

The scope of the accreditation shall also explicitly state ISO/IEC 17021:2011, this document and other requirements against which the certification body has been assessed (e.g. PEFC D 1003-2 or PEFC D 1003-3).

The GFCS standard on requirements for certification bodies and notification define together the requirements for certification bodies and procedures. GFCS notification requirements state clearly that in

- i. For accreditation bodies the German national accreditation body DAkkS (Deutsche Akkreditierungsstelle GmbH) shall issue forest management certification. DAkkS is signatory to the IAF Multilateral Agreement (MLA). The accreditation shall be issued against ISO/IEC 17021:2011 and PEFC D 1003-1, PEFC D 1003-2 and PEFC D 1003-3 and the scope of the accreditation shall explicitly include PEFC Germany's forest management standards PEFC D 1002-1, PEFC D 1002-2, PEFC D 1002-3.
- ii. For chain of custody certification the scheme accepts certification bodies with accreditation by any national accreditation body that complies with the requirements of



the international PEFC ST 2003 standard is among other signatories to the MLA and the accreditation shall be issued against ISO/IEC 17065 and the scope of the accreditation shall explicitly include PEFC D ST 2002:2013.

PEFC D 1003 requires that certification bodies shall make publicly available a summary of the surveillance audit report and describes the summary content. This is not required in PEFC chain of custody certification.

Timelines for annual surveillance audits are defined in ISO 17021 for forest management certification and ISO 17065⁴ for chain of custody certification. The validity period of an issued certificate is three and five years, respectively, which complies with PEFC requirements.

11.2 Notification of Certification Bodies

According to PEFC rules, the GFCS recognizes only the certificates that are issued by the certification bodies that have applied and been given a notification in line with PEFC D 4007:2014. GFCS issues notification to the certification bodies that comply with the above described accreditation requirements and other requirements listed in the GFCS notification standard. The notification is valid over the certification body's accreditation period.

Notification contracts applying to all three types of forest management certifications and chain of custody certification specify the responsibilities of both parties e.g. regarding information exchange.

In addition to the compliance with relevant ISO standards for conformity assessment of management systems or products, GFCS and PEFC accreditation standards require that a notified certification body shall (PEFC D 4007):

- a) Carry out the forest management certification and/or chain of custody certification within the scope of the valid accreditation.
- b) Inform PEFC Germany about any changes in its accreditation, the scope of which covers the forest management and/or chain of custody certification.
- c) Provide PEFC Germany, immediately, with information on every forest management and/or chain of custody certificate, which is covered by the notification, and/or information on any changes to already issued certificates. The range of data is specified by PEFC Germany and provide a list of participants selected for the sample (according to PEFC D 1003-1, annex 3) at least four weeks ahead of the first audit.
- d) Pay PEFC Germany the quarterly notification fee for every issued certificate based on an invoice issued by PEFC Germany based on tariffs decided by PEFC Germany.

The notification contract does not require that certification bodies control the PEFC logo use of license holder. The PEFC standard on logo licensing requires the control.

11.3 Results

The GFCS procedures for certification and accreditation of certification bodies for forest management and chain of custody certification comply with PEFC requirements.

Notification requirements are non-discriminatory. A request to clarify the principles of defining notification fee is raised in order to get a full assurance on non-discriminatory notification procedures.

⁴ ISO 17065 Conformity assessment — Requirements for bodies certifying products, processes and services.



12. COMPLAINTS AND DISPUTE PROCEDURES

12.1 Analysis

The GFCS has separate documents defining dispute resolution procedures related to

- i. the activities of PEFC Germany (PEFC D 4005:2014)
- ii. activities of the regional working group or implementation of sustainable forest management by participants in the regional certification (PEFC D 3003:2014).

The documents describe the acceptance, resolution process and documentation processes for complaints. An independent Task Force Group nominated by the PEFC Germany's Chairperson addresses the grievance procedures related to the activities of PEFC Germany. The Group comprise of one or more persons who shall have no vested or conflict of interest in the complaint or appeal. Alternatively, in justified circumstances, the Group may have balanced representation of concerned parties.

The Group studies the complaint and makes a written report, to the PEFC Germany's Chairperson to be presented to the Board of Directors. The report shall include a statement indicating whether, or not, the complaint or appeal has been substantiated and recommendations on resolving the complaint/appeal. The Board of Directors shall approve or disapprove the conclusions of the report and will stipulate the final outcome. No further appeals opportunities are provided by the GFCS.

In regional working groups, the decision-making procedures are similar with the only distinction that the highest responsible body is a regional working group or a body appointed by the working group. Regional dispute settlement procedures do not either provide the opportunity to appeal at a Federal level within the GFCS procedures.

The disputes addressed to PEFC Germany include complaints and appeals against PEFC Germany on (i) standard setting, (ii) development and interpretation of PEFC Germany's standard, (iii) logo usage licencing or (iv) notification of certification bodies.

In regional working groups, appeals can be raised by any person or organization, which relates to the activities of the regional working group or implementation of sustainable forest management by participants in the regional certification.

Complainants are responsible for providing the essential information on the dispute.

Dispute settlement procedures set timelines for addressing and investigating the submitted complaints. All parties are responsible for their costs regardless of the outcome of the dispute.

12.2 Results

The dispute settlement procedures conform to PEFC requirements on (i) written procedures, (ii) acknowledgement and registration of complaint and (iii) formal communication on the complaint.

The main responsibility to provide information is with the complainant, which puts pressure to the Task Force Group to be confident that decision-making is based on unbiased, relevant and adequate information. The Task Force Group has the possibility to complement the information if it so decides.

The German PEFC governing body, the GFCC is the highest decision making body on all disputes that concern their activities and they can overrule the recommendations given by the Task Force Group that is also nominated by the GFCC. The same structure applies in regional level where the regional working group or a body nominated by it is the decision maker in disputes. This arrangements sets challenges on the independent grievance procedures, especially if GFCC is a party in the conflict.



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Despite of these comments the GFCS procedures for dispute settlement comply with PEFC requirements.



13. STAKEHOLDER SURVEYS

13.1 International PEFC Consultation

PEFC Council launched the international consultation on the GFCS on 18 February - 20 April 2015. No comments were submitted in the international consultation.

13.2 National Stakeholder Questionnaire

A national questionnaire on the standard revision process, which was launched in 2013, was sent to the 106 parties who participated or might have had an interest in forest certification standard revision process and outcomes. The questionnaire was sent by email and PEFC Germany mostly provided contact details. Respondents had one week to reply to the questionnaire. As the result, only five replies were received (Table 13.1).

Table 13.1 Summary of Comments of National Consultation

Replying interest groups	Comments on issues
Forest owners/managers Administration ENGO Trade union Research on forestry	<p>Replying parties were informed on the standard setting, its procedures in a timely manner before and throughout the process.</p> <p>The perception was that all interested parties had a possibility for meaningful participation. Access to participate was considered better compared to FSC standard development because PEFC did not require membership in any certification related organisation.</p> <p>No concerns or disputes were raised for their information; disagreeing views were discussed in the WG. The standards were decided upon with a significant majority vote – not in full consensus.</p> <p>Further improvement in standard to be done in the following revision.</p>

The results of national consultation do not need any special consideration in this conformity assessment. They give support to the conclusion of the independent assessor(s) that in general the standard setting process was well planned and participatory.

A summary of replies is presented in Appendix 3.



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Appendix 1

Indufor Assessment on AFCS Conformity with PEFC Checklist (PEFC IGD 1007-01:2012)

Indufor Assessment on the Compliance of the PEFC Germany Forest Certification Scheme

PEFC Standard and System Requirement Checklist for PEFC Council Re-endorsement in 2015

Purpose:

- The assessment presented in this Appendix covers all PEFC Council requirements for endorsed forest certification schemes.

Scope:

- The assessment covers all four forest management standards: regional, FMU level sustainable forest management, Christmas tree plantation and recreational forest management, although the assessor recommends that the latter two standards are not covered by the PEFC Council endorsement.

Explanations:

- The conclusion on conformity with PEFC requirement is presented in column YES/NO. YES is indication for a full conformity and NO indicates that additional evidence is needed, that given reference documents are not correct, or any other issue that needs further inputs from the applicant.
- Justification for the conclusion on conformity is provided under the column "Comment" in a form of an extract from a scheme document or in an assessor's explanation (always written in italic).

Part I: Standard and System Requirement Checklist for Standard Setting (PEFC ST 1001:2010)

- 2 Checklist

Referred GFCS documents


Standard revision procedures	PEFC D 4001:2013
Statutes of PEFC Germany	PEFC D 4002:2010
Revision of the German PEFC scheme. 2013-2014. Standard revision report	SRR Dec 23, 2014
Dispute settlement procedures	PEFC D 4005:2014
Regional forest management certification – Requirements	PEFC D 1001:2014
Requirements for bodies providing audits for regional certification	PEFC D 1003-1:2014
Tools for the definition of objectives and regional action programmes	PEFC D 3001:2014
PEFC Regional logo usage rules – Requirements	PEFC D 1004:2014
CoC specification for regional label	PEFC D 2002-1:2014


Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
Standardising Body				
4.1 The standardising body shall have written procedures for standard-setting activities describing:				
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	YES	PEFC D 4001:2013: Working groups (WG) as consensus building bodies; PEFC D 4002:2010: German Forest Certification Body (GFCC) for formal adoption.	<p>Structure of the standardising body – GFCC - is defined in Ch. 6 section 1 PEFC D 4002.</p> <p>Body responsible for consensus building is defined in Ch. 4 of PEFC D 4001:2013: “The decisions of the working group to publish the working draft and to recommend the final draft to the GFCC for formal approval shall be based on consensus. The chairperson of the working group is responsible for the judgement on whether there is sufficient support.”</p> <p>Process of the formal adoption of the standard is described in Ch. 6 of PEFC D 4001:2013: “Within four weeks after formal approval of the documents, the secretariat shall correct all mistakes within the formally approved document and publish it together with the standard setting report on the website. Additionally, the publication of the approved document must be announced via appropriate channels.”</p>
b) the record-keeping procedures,	Procedures	YES	PEFC D 4001, Ch. 7	Record-keeping procedures are described in Ch. 7 “Documentation” of PEFC D 4001:2013

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				<p>The following documents shall be collected and kept for at least five years:</p> <ul style="list-style-type: none"> a) Description of the revision process. b) Public announcements, e.g. about the start of the revision process, the seminar or the consultation period. c) Minutes of the GFCC meeting. d) Minutes of the working group meetings. e) Proofs for consensus, e.g. summary of the controversial issues and their settlement f) Documentation of the public seminar. g) Documentation of the comments or complaints received. h) Proposal for transition periods for the implementation of the new standards and procedures.

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
c) the procedures for balanced representation of stakeholders,	Procedures	YES	PEFC D 4001, Ch. 2.3	<p>Ch. 2.3. of PEFC D 4001: Two working groups shall be installed to manage the revision process. The working group “Standards” shall deal with the development of the indicators for the regional level and of the criteria for sustainable forest management on the operational level. The other working group, “Procedures”, shall revise the procedures as defined in the description of the system and its appendices which are not referring to indicators and criteria.</p> <p>The following eight interest groups shall be invited to join the working groups and to participate in the revision process:</p> <ol style="list-style-type: none"> 1. Representatives of private forests 2. Representatives of state forests 3. Representatives of communal forests 4. Timber, pulp and paper industry, including trade 5. Environmental NGOs 6. Trade Unions 7. Other representations of forestry (German Forestry Council, Agricultural Chambers) 8. Other user groups (consumer organisation, tourism associations) 9. Forest service enterprises 10. Science <p>A balanced mix of members of the working groups with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process.</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
d) the standard-setting process,	Procedures	YES	PEFC D 4001, Ch. 3 to 6	Standard-setting process is described in Ch.3 “Preparation of the revision process”, Ch. 4 “Working Group Meetings” and Ch. 5 “Consultations” Ch. 6 “Final decision” of PEFC D 4001:2013
e) the mechanism for reaching consensus, and	Procedures	YES	PEFC D 4001, Ch. 4	Definition of consensus as well as mechanisms for reaching consensus are set in Ch. 4 of PEFC D 4001:2013: “The chairperson of the working group is responsible for the judgement on whether there is sufficient support. He/ she shall base this judgement on the definition of consensus in the ISO/IEC guideline 2:1996..... To reach consensus the working group can utilise the following alternative processes to establish whether there is opposition (in terms of the ISO definition) to the standard (draft):...”
f) revision of standards/normative documents.	Procedures	YES	PEFC D 4001, Ch. 1 and 8	Revision of standards/normative documents is explained in Ch. 1 “The document shall be regularly revised and adapted at least every five years considering comments of interested parties. The document is publicly available” and Ch. 8 “Revision” of PEFC D 4001
4.2 The standardising body shall make its standard-setting procedures publicly available and shall regularly review its standard-setting procedures including consideration of comments from	Procedures	YES	PEFC D 4001, Ch. 1	Ch. 1 of PEFC D 4001 “For standard setting, PEFC Germany promotes the participation of a wide spectrum of stakeholders. The procedure shall be open and transparent and lead to consensus among all participants... The document shall be regularly revised and adapted at least every five years considering comments of interested parties. The document (PEFC D 4001) is publicly available”

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
stakeholders.	Process	YES	Standard Revision Report (SRR), Ch. 3, 1st bullet point and Ch. 4.5, 1 st , 2 nd and 3rd bullet points	<p>Public availability and invitation for commenting was secured by posting information regarding revision of the document “Standard revision procedures” on www.pefc.de</p> <p>Ch. 4.5 of SRR: “ An Internet forum, including invitation is launched on 26 Sept. 2013 providing the opportunity to everyone to comment on the existing PEFC documents (<i>including PEFC D 4001</i>), <i>Figure 1</i></p> <p>Ch. 4.5 of SRR: “A press release is published on www.pefc.de reporting about the kick-off meeting, pointing to the internet forum and particularly inviting to comment on the document “Standard revision procedures”, <i>Figure 2</i></p> <p>Ch. 4.5 of SRR: ...50 comments were submitted by 31 Dec 2013</p> <p>Figure 1</p> <p>Internet-Forum zur Standardrevision</p> <p>Hinterlassen Sie uns Ihren Kommentar oder arbeiten Sie in einer Arbeitsgruppe mit.</p>  <p>https://pefc.de/pefc-standards-fuer-deutschland.html</p> <p>Diese ersten Kommentare geben bereits Hinweise darauf, mit welchen Schwerpunktthemen sich die Arbeitsgruppe Standards in den nächsten Monaten beschäftigen wird: Die Konkretisierung des Begriffes der „qualifizierten Motorsägenlehrgänge“, die seit diesem Jahr für private Selbstverwerber verpflichtend vorgeschrieben sind, wird eine Rolle spielen; auch die Ausweitung der Ausnahmeregelung für die Zertifizierung von Forstunternehmern – über landwirtschaftliche Zuerwerbsbetriebe hinaus – wird im Mittelpunkt stehen. Ferner besteht Bedarf, den Begriff des „angemessenen Umfangs“ in Bezug auf Biotopholz genauer zu definieren.</p> <p>Zurück</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				<p>Figure 2 Einladung zum Auftakt der PEFC-Revision</p> <p>PEFC Deutschland beginnt mit seiner Standardrevision.</p>  <p>Zum Auftakt des anstehenden Revisionsprozesses möchten wir Sie herzlich zu einem Workshop einladen:</p> <p>Dienstag, den 17. September 2013 von 11.00 – 18.00 Uhr im Juliusospital Würzburg, Zehntscheune, Juliuspromenade 19, 97070 Würzburg (s. beigefügtem Lageplan)</p> <p>Wir wollen mit Ihnen – als Grundlage für unsere Strategieentwicklung – die Situation der Waldzertifizierung in Deutschland analysieren, relevante Strategiefelder identifizieren und Handlungsempfehlungen erarbeiten.</p> <p>In den kommenden 15 Monaten werden Sie in verschiedenen Phasen des Revisionsprozesses die Möglichkeit haben, sich und Ihre Ideen einzubringen:</p> <p>09.2013 Teilnahme am Stakeholder-Workshop 10.2013 Diskussionsbeiträge im Rahmen des Internet-Forums Mitarbeit in einer der PEFC-Arbeitsgruppen (Standards oder Verfahren) 07.2014 Teilnahme am Kongress „Würzburg + 15“ (Diskussion des ersten Standardentwurfs 10.2014 Beteiligung an der öffentlichen Konsultation zum zweiten Standardentwurf (60 Tage)</p> <p>Geren können Sie sich mit diesem Antwortvordruck zu der Veranstaltung anmelden.</p> <p>Die offizielle Einladung des PEFC-Vorsitzenden Herrn Prof. Dr. Schraml finden Sie hier.</p> <p>Zurück</p>
<p>4.3 The standardising body shall keep records relating to the standard-setting process providing evidence of compliance with the requirements of this document and the standardising body's own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request.</p>	<p>Procedures</p>	<p>YES</p>	<p>PEFC D 4001, Ch. 7</p>	<p>Ch. 7 Of PEFC D 4001 sets the documentation procedure: “With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years:</p> <p>Description of the revision process. Public announcements, e.g. about the start of the revision process, the seminar or the consultation period.</p> <ul style="list-style-type: none"> - Minutes of the GFCC meetings. - Minutes of the working group meetings. - Proofs for consensus, e.g. summary of the controversial issues and their settlement - Documentation of the public seminar.

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				- Documentation of the comments or complaints received. Proposal for transition periods for the implementation of the new standards and procedures."
	Process	YES	Examples of minutes	<i>PEFC Germany maintains records on the standard setting process.</i>
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	Procedures	YES	PEFC D 4001, Ch. 2.1, 2.3 and 3.3	Ch. 2.1 of PEFC D 4001 GFCC "sets up working groups, assigns their members and determines the chairperson of the working groups"; Ch. 2.3 of PEFC D 4001 GFCC "Two working groups shall be installed to manage the revision process" - WG "Standards" shall deal with the development of the indicators for the regional level and of the criteria for sustainable forest management on the operational level. - WG "Procedures", shall revise the procedures ...which are not referring to indicators and criteria.
	Process	YES	Standard revision report (SRR), Ch. 4.4	Ch. 4.4. of SRR describes how the WG was appointed: "45 people are proposed as members of the WG „Standards“ and 15 people for the WG „Procedures“. Based on the results of a written vote, the GFCC appointed all of the proposed members on 6 November 2013. On the GFCC meeting on 26 November 2013 additional nine persons

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				are appointed, who have been nominated afterwards. In the end, the working group “Standards” includes 52 members, the working group “Procedures” 17 members”
4.4 The working group/committee shall:				
a) be accessible to materially and directly affected stakeholders,	Procedures	YES	PEFC D 4001, Ch. 2.3 and 3.3	<p>10 interest groups are listed in Ch. 2.3. of PEFC D 4001 and invited in a “timely, publicly and appropriate way to participate in the revision process” (Ch. 3.3. of PEFC D 4001)</p> <p><i>The GFCC has defined the categories of member organisations in the standard setting working group. The list of 10 interest groups is quite comprehensive, but lacks e.g., social NGOs. However, the list includes major affected interest groups and the system allows acceptance of additional members from regional or national levels. Approval is decided by voting by the GFCC.</i></p> <p><i>Special effort is made to invite stakeholders that have not previously participated in the standard setting WG.</i></p> <p><i>Despite of the fact that the interest groups do not have a free access to participate in the WG the interests of materially / directly affected stakeholders can be secured.</i></p>
	Process	YES	SRR, Ch. 4.2 and	Ch. 4.2 of the SRR describes how relevant stakeholders were identified and approached: “The secretariat identifies the organisations that are not members of PEFC Germany, but relevant for the revision. As there are no “disadvantaged” stakeholders in Germany, but those


Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
			4.4	<p>organisations are regarded as “key stakeholders” who are most critical for/about PEFC and did not participate in the past revisions (see Appendix 1).</p> <p>On 8 August 2013, these organisations received a letter from the chairman informing about the opportunities to participate and inviting them to a stakeholder workshop. Representatives of the environmental NGO’s BUND, NABU, RobinWood and WWF are contacted by the chairman over the telephone.</p> <p>The invitation to the stakeholder workshop, including an overview on the whole revision process, is published on the website of PEFC Germany, on 21 August 2013”.</p>
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	YES	PEFC D 4001, Ch. 2.3	Stakeholder identified in Ch. 2.3. of PEFC D 4001 include various and diverse stakeholder categories. The chapter includes a note that “A balanced mix of members of the working groups with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process”.
	Process	YES	SRR, Ch. 4.2 and 4.4, incl. Appendix 1	Different stakeholder groups have a fairly balanced representation. 52 % of members represent different forest owner categories, the share of ENGOs is 6% and that of forest industry is 3% (Annex 2 of the SRR).
c) include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the	Procedures	YES	PEFC D 4001, Ch. 2.3	<i>See Question 4.1 c) for the list of interest groups invited to participate in the WG, participation of the listed organisations assure compliance with the PEFC requirement.</i>


Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.	Process	YES	SRR, Ch. 4.2 and 4.4, incl. Appendices 1 and 2	Forest owners and forest industry have together a significant representation in the standard setting working group (55% in total)
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	PEFC D 4001, Ch. 4; PEFC D 4005:2014	Ch. 4 of PEFC D 4001 <i>describes decision making rules and consensus building in WG meetings and refers to dispute settlement procedures.</i> PEFC D 4005:2014: 4.2 It is the responsibility of the complainant/ appellant to submit written information which can be verified as accurate and correct through an independent source. 5.2 The Task Force Group shall undertake a thorough investigation and seek a resolution. <i>The appellant has the main responsibility to provide the information for grievance procedure. TFG is not obliged nor limited for looking for additional information in order to base the decision making on unbiased information.</i>
	Process	n.a.	No substantive or procedural complaints received.	


Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
4.5 Upon receipt of the complaint, the standard-setting body shall:				
a) acknowledge receipt of the complaint to the complainant,	Procedures	YES	PEFC D 4005, Ch. 4	Ch. 4 of PEFC D 4005 states that “The PEFC Germany’s Secretary General shall without delay: a. acknowledge to the complainant/ appellant (in writing) the receipt and acceptance/rejection of the complaint/ appeal, including its justification”
	Process	n.a.	No complaints received.	
b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint, and	Procedures	YES	PEFC D 4005, Ch. 5.1 to 5.3	Information gathering is described in Ch. 5.2 of PEFC D 4005: “The TFG shall undertake a thorough investigation and seek a resolution”, impartiality - in Ch. 5.1 “The members of the TFG shall have no vested or conflict of interest in the complaint or appeal” and decision-making in Ch. 5.3 - “The Board of Directors shall approve or disapprove the conclusions of the report, including its recommendations and relevant corrective and preventive actions.”
	Process	n.a.	No complaints received.	

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	Procedures	YES	PEFC D 4005, Ch. 5.4	Obligation for communicating the results of investigation is set in Ch. 5.4 of PEFC D 4005: "The PEFC Germany's Secretary General shall, without delay, inform the complainant/ appellant and other interested parties about the outcomes of the complaint/ appeal resolution process, in writing."
	Process	n.a.	No complaints received.	
4.6 The standardising body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	Procedures	YES	PEFC D 4005, Ch. 4.1	Complaints and appeals are advised to be provided to the PEFC Germany's Secretariat (Ch. 4.1 of PEFC D 4005).
Standard-setting process				
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	YES	PEFC D 4001, Ch. 2.3 and 3.3	Stakeholder groups are listed in Ch. 2.3 of PEFC D 4001. Ch. 3.3 Stakeholders holding a key position or not having participated in past revisions are identified and personally invited Members of PEFC Germany and Regional WGs can participate in standard setting and propose other members.

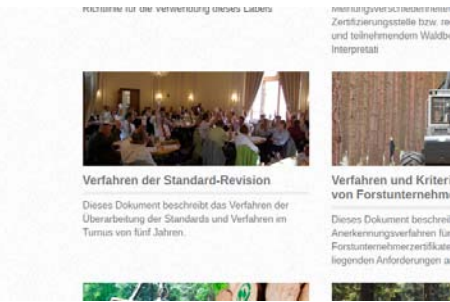
Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
	Process	YES	SRR, Ch. 4.2 and 4.4	Ch. 4.2 of SRR points out that “the secretariat identifies the organisations that are not members of PEFC Germany, but relevant for the revision”.
5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.	Procedures	YES	PEFC D 4001, Ch. 3.3	Ch. 3.3 of PEFC D 4001 contains a provision on this aspect: “Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person.”
	Process	YES	SRR, Ch. 4.2	Ch. 4.2 of SRR states that “there are no “disadvantaged” stakeholders in Germany, but those organisations are regarded as “key stakeholders” who are most critical for/about PEFC and did not participate in the past revisions”. According to the report key stakeholders were contacted on August 8, 2013. The list of them is presented in the Annex 1 of SRR. In the scope of the stakeholder mapping PEFC Germany identified 518 stakeholders. As a result of the assessment of these stakeholders, none of them has been identified as "disadvantaged" in terms of language and/or financial/human resources.
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	Procedures	YES	PEFC D 4001, Ch. 3.1	Public announcement and an invitation for participation are mentioned in Ch. 3.1 of PEFC D 4001: “The commencement of the revision process shall timely be communicated to the public in an appropriate way (e.g. press release, newsletter)”

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions.	Process	YES	SRR, Ch. 4.2 and 4.4, 2 nd bullet point	<p>According to Ch. 4.2 of SRR PEFC Germany sent a letter for participation in the revision process on August 3, 2013 – a requirement of timeliness has been fulfilled.</p> <p>According to Ch. 4.4 of SRR a press release was published on September 26, 2013 (<i>Figure 3</i>) – a requirement of announcing revision publicly has been also met.</p> <p>Figure 3</p> <p>Internet-Forum zur Standardrevision</p> <p>Hinterlassen Sie uns Ihren Kommentar oder arbeiten Sie in einer Arbeitsgruppe mit.</p>  <p>Zurück</p>
5.3 The announcement and invitation shall include:				
a) information about the objectives, scope and the steps of the standard-setting process	Procedures	YES	PEFC D 4001, Ch. 3.1	Obligation for provision of such information is set in Ch. 3.1 of PEFC D 4001: “This communication shall inform about the objectives, the scope, the schedule....”

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
and its timetable,	Process	YES	SRR, Ch. 4.2 invitation letter of August 8, 2013	<p>Figure 4</p>  <p>Information about the objectives, scope and the steps of the standard-setting process and its timetable has been provided on the website https://pefc.de/pefc-standards-fuer-deutschland.html <i>Figure 4</i></p>
b) information about opportunities for stakeholders to participate in the process,	Procedures	YES	PEFC D 4001, Ch. 3.1	Obligation for provision of information regarding opportunities for participation is also set in Ch. 3.1 of PEFC D 4001: "This communication shall inform about the ... opportunities for participation"
	Process	YES	SRR, Ch. 4.2 and 4.5	<p>According to Ch. 4.4 of SRR</p> <ul style="list-style-type: none"> - a letter was sent to 61 stakeholders (19 Sept 2013) - a press release on www.pefc.de referring to the Internet forum (26 Sept 2013, <i>Figure 5</i>)


Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				<p>- an invitation to the Internet forum was also published in the printed journal „Holz-zentralblatt“ on October 4, 2013.</p> <p>Figure 5</p> <p>Internet-Forum zur Standardrevision</p> <p>Hinterlassen Sie uns Ihren Kommentar oder arbeiten Sie in einer Arbeitsgruppe mit.</p>  <p>Stuttgart, 26. September 2013. Hinterlassen Sie uns Ihren Kommentar unter: https://pefc.de/pefc-standards-fuer-deutschland.html</p> <p>Alle Interessenten, die an einer der Arbeitsgruppen (Verfahren und Standards) mitwirken möchten, bitten wir sich bei der Geschäftsstelle von PEFC Deutschland zu melden.</p> <p>Diese ersten Kommentare geben bereits Hinweise darauf, mit welchen Schwerpunktthemen sich die Arbeitsgruppe Standards in den nächsten Monaten beschäftigen wird: Die Konkretisierung des Begriffes der „qualifizierten Motorsägenlehrgänge“, die seit diesem Jahr für private Selbstwerber verpflichtend vorgeschrieben sind, wird eine Rolle spielen; auch die Ausweitung der Ausnahmeregelung für die Zertifizierung von Forstunternehmern – über landwirtschaftliche Zuerwerbsbetriebe hinaus – wird im Mittelpunkt stehen. Ferner besteht Bedarf, den Begriff des „angemessenen Umfangs“ in Bezug auf Biotopholz genauer zu definieren.</p> <p>Zurück</p>
<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>	<p>Procedures</p>	<p>YES</p>	<p>PEFC D 4001, Ch. 3.3</p>	<p>Ch. 3.3 of PEFC D 4001 contains a clause on stakeholders’ opportunity to nominate representatives: “In addition, the members of PEFC Germany (according to Ch. 3 of the statutes) and the members of the regional PEFC working groups (according to Ch. 2.1, 1001:2009) can participate in the working groups. They are also entitled to <u>propose other persons to become member</u> of the working groups”. PEFC Germany makes sure that disadvantaged and key stakeholders are personally invited – this requirement is set in the statement that “Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person”.</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
	Process	YES	SRR, Ch. 4.2 SRR Appendix 1	According to Ch. 4.2 of SRR - a letter was sent to 29 key stakeholders on 8 August 2013 with an invitation to a workshop on 17 Sept 2013 - four ENGOs were contacted by telephone - Invitation letter was sent to 61 stakeholders (19 Sept 2013) - a press release on www.pefc.de referring to the Internet forum (26 Sept 2013)
d) an invitation to comment on the scope and the standard-setting process, and	Procedures	YES	PEFC D 4001, Ch. 3.2	Invitation for commenting is mentioned in Ch. 3.2 of PEFC D 4001: “The public announcement shall also point to an internet forum, giving each interested person the opportunity to comment on the existing documents.”
	Process	YES	SRR, Ch. 4.5	PEFC Germany opened an Internet forum and posted an invitation to comment standard setting procedures on the website - www.pefc.de Invitation was also published in the journal of „Holzzentralblatt”. 50 comments were received.
e) reference to publicly available standard-setting procedures.	Procedures	YES	PEFC D 4001, Ch. 3.2	Ch. 3.1 of PEFC D 4001 states that announcement of the revision process should make a reference to standard-setting procedures: “The procedures of the standard revision shall also be referred to and participants shall be invited to comment on its scope and contents”.

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
	Process	YES	SRR, Ch. 4.5	<p>Figure 6</p>  <p>Internet forum had a link for accessing standard-setting procedures (Figure 6). Published also in journal „Holzzentralblatt“, and discussed in stakeholder workshop on 17 Sept 2013.</p>
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. <u>The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working</u>	Procedures	YES	PEFC D 4001, Ch. 3.1 and 3.3	<p>Ch. 3.1 of PEFC D 4001: “The procedures of the standard revision shall also be referred to and participants shall be invited to comment on its scope and contents”.</p> <p>GFCC is responsible for establishing a working group - Ch. 3.3 of PEFC D 4001 -“The GFCC appoints the members and the chairpersons of the working groups”.</p> <p>Ch.2.3 ... A balanced mix of members of the working groups with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process. In addition a list of 10 stakeholder</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
group/committee and resources available for the standard-setting.				<p>organisations are guaranteed a participation.</p> <p>The GFCC has accepted all nominations received and this is justified by the GFCC's objective to provide maximum opportunity for participation.</p>
	Process	YES	SRR 4.5 No comments on standard-setting process received, no nominations refused.	<p>Within the commenting period (<i>of standard setting procedures PEFC D 4001 etc.</i>) 50 comments were submitted in the Internet forum.</p> <p><i>The Secretariat of PEFC Germany analysed the comments and presented a summary in the first WG meeting. Comments addressed only the content of the standard.</i></p>
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	PEFC D 4001, Ch. 4	Ch. 4 of PEFC D 4001 states that "the minutes and drafts are provided to all working group members".
	Process	YES	SRR, Ch. 5 and 7	<p><i>Invitations to working group meetings were made by e-mails including the agenda and all documents covered by the scope of the agenda. Minutes of each meeting were also provided by emails.</i></p> <p><i>Evidence on the information was provided to the consultant by PEFC</i></p>

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				<i>Germany/GFCC.</i>
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	PEFC D 4001, Ch. 4	Ch. 4 of PEFC D 4001 states that “The minutes and drafts are provided to all working group members. All members have the possibility to comment on these.” Each interest group has a maximum of 4 votes. Issues that have been declared as important by an interest group, giving reasons for this, at the beginning of the revision process, shall be considered as “substantial” according to this definition of consensus. If new issues arise in the course of the working process, these can also be declared as “substantial” at the beginning of the discussion.
	Process	YES	SRR, Ch. 5 and 7, 7.2	The drafts were discussed openly in the four WG meetings.
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	PEFC D 4001, Ch. 4	Ch. 4 of PEFC D 4001 states that all comments and views “are documented and discussed within the working group”.
	Process	YES	SRR, Ch. 5 and 7	According to the SRR report members of standard setting WG made various proposals. <i>Evidence on the information was provided to the consultant by PEFC Germany/GFCC.</i>

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
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	PEFC D 4001, Ch. 5	An exact reference for that can be found from Ch. 5 of PEFC D 4001: “The invitation for public consultation, including its commencement and end, shall be made in time and via appropriate channels, e.g. website, e-mail etc.”
	Process	YES	SRR, Ch. 6.3, 6.5	<p>An announcement for a public consultation was posted via e-mail to a distribution list containing 320 addresses on 4 August 2014. PEFC Germany’s Newsletter no. 60 (<i>Figure 7</i>) communicated the invitation on 18 August, 2014. Consultation period ended on October 3, 2014.</p> <p>Figure 7</p>  <p>kann Stellung genommen werden. Getreu unseres Mottos „Zertifizierung lebt vom Mitmachen“ haben alle Interessierten die (vorerst letzte) Möglichkeit, sich einzubringen, bevor die PEFC-Arbeitsgruppen unter Berücksichtigung der eingegangenen Kommentare die finalen Entwürfe erstellen und dem Deutschen Forst-Zertifizierungsrat zur Abstimmung vorlegen. Ende des Jahres soll der Prozess abgeschlossen sein und das revidierte deutsche PEFC-System PEFC International zur erneuten Anerkennung vorgelegt werden.</p>
b) the invitation of disadvantaged and key	Procedures	YES	PEFC D	Ch. 5 of PEFC D 4001: “The key stakeholders shall be invited in a way

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable,			4001, Ch. 5	<p>that ensures the receipt by the addressee.”</p> <p><i>Stakeholder mapping identified 518 stakeholders, none of them could be considered as disadvantaged (See Q5.2)</i></p> <p><i>In addition the bi-monthly newsletter distribution reaches almost 4,000 e-mail addresses. The newsletter has covered all relevant information on the standard revision process.</i></p>
	Process	YES	SRR, Ch. 6.1 to 6.5	<p>Ch. 6.5...consultation was posted via e-mail to a distribution list containing 320 addresses</p> <p>Ch. 6.3 invitation by Newsletter to more than 200 addressees.”</p> <p>Posted on www.pefc.de</p>
c) the enquiry draft is publicly available and accessible,	Procedures	YES	PEFC D 4001, Ch. 5	According to Ch. 5 of PEFC D 4001 “The draft will be published on the website of PEFC Germany and also provided to the interested public via other channels, if necessary.”
	Process	YES	SRR, Ch. 6.4	Enquiry drafts have been published online (<i>Figure 8</i>) on the webpage of the forum https://pefc.de/pefc-standards-fuer-deutschland.html







Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				<p>Revision der PEFC-Standards</p> <p>Zertifizierung lebt vom Mitmachen!</p> <p>Alle fünf Jahre steht gemäß der internationalen Statuten die Revision der nationalen PEFC-Systeme an. Bei der Überarbeitung werden Punkte wie die Integration neuer wissenschaftlicher Erkenntnisse, die Berücksichtigung der Erfahrungen von teilnehmenden Waldbesitzern, Auditoren und Standardsetzern bei der Umsetzung des aktuellen Standards, wichtig werden. Am Ende des Prozesses sollen Standards stehen, die im Konsens erarbeitet wurden und die keine Fragen bezüglich ihrer Interpretation offen lassen.</p> <p>Die ersten Entwürfe, welche die PEFC-Arbeitsgruppen „Standards“ und „Verfahren“ in zahlreichen Sitzungen seit September 2013 erarbeitet hatten, wurden auf dem Seminar („Würzburg-15“) am 03.07.2014 der Öffentlichkeit vorgestellt und mit den Teilnehmern diskutiert. Die Dokumentation des Seminars finden Sie auf dieser Internet-Seite (rechts: Die Ergebnisse des Würzburg-15-Kongress).</p> <p>Im Rahmen dieses Internet-Forums haben auch Sie nun bis 03.10.2014 die Möglichkeit, diese ersten Entwürfe zu kommentieren und Änderungsvorschläge zu unterbreiten. Helfen Sie uns so, das PEFC-System zu verbessern. Denn Zertifizierung lebt vom Mitmachen! Der Deutsche Forstzertifizierungsrat wird unter Berücksichtigung der Ergebnisse dieser Konsultation Ende des Jahres die neuen Standards und Verfahren beschließen.</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;">  <p>PEFC-Standards für Deutschland</p> <p>Dieses Dokument beschreibt die forstbetrieblichen Anforderungen, die von den teilnehmenden Waldbesitzern eingehalten werden müssen.</p> </div> <div style="width: 50%;">  <p>Anforderungen an Weihnachtsbaumkulturen</p> <p>Dieses Dokument beschreibt die Anforderungen, die ein PEFC-zertifizierter Betrieb erfüllen muss, wenn dieser zusätzlich Weihnachtsbaumkulturen auf Wäldflächen einzelbetrieblich zertifizieren lassen möchte.</p> </div> <div style="width: 50%;">  <p>Anforderungen an Erholungswald</p> <p>Dieses Dokument beschreibt die Anforderungen, die ein PEFC-zertifizierter Betrieb erfüllen muss, wenn dieser zusätzlich Erholungswald einzelbetrieblich zertifizieren lassen möchte.</p> </div> <div style="width: 50%;">  <p>Systembeschreibung</p> <p>Dieses Dokument beschreibt, wie das deutsche PEFC-System funktioniert.</p> </div> <div style="width: 50%;">  <p>Anforderungen an die Region</p> <p>Dieses Dokument beschreibt insbesondere die Aufbau- und Ablauforganisation sowie die Verantwortlichkeiten der Regionalen Arbeitsgruppen und beinhaltet die Indikatorenliste für die regionalen Waldberichte.</p> </div> <div style="width: 50%;">  <p>Anforderungen an Zertifizierungsstellen und Auditoren</p> <p>Dieses Dokument beschreibt die Anforderungen an Zertifizierungsstellen und Auditoren im Bereich Waldzertifizierung und beinhaltet die Anleitung zu den Vor-Ort-Audits.</p> </div> </div> <div style="float: right; width: 20%;"> <p>Wie kommentiere Klicken Sie hier Anleitung</p> <p>Ergebnisse des Kongress</p> <ul style="list-style-type: none"> Standards Verfahren Weihnachtsbaum Erholungswald PEFC-Regional <p>Alle „Standards „Verfahren“ auf</p> <ul style="list-style-type: none"> PEFC D 1002:2t Standards für die Änderungsmodu ENTWURF: PE Weihnachtsbaum Wäldflächen ENTWURF: PE Erholungswald PEFC D 0001:2t Systembeschreib PEFC D 1001:2t an die Region PEFC D 1003:2t an Zertifizierung Auditoren PEFC D 1004:2t Verwendung des Labels und PEFC D 2002:1: Holzprodukten – das PEFC-Siegel PEFC D 2003:2t Scheidungsverfahren PEFC D 2004:2t Standard-Review PEFC D 2005:2t Kriterien zur Ang Forstunternehme PEFC D 2006:2t Anforderungen von und Vergabe von PEFC D 2007:2t Anerkennung von Holzumlaufums Sais- und Pflanz kontrollierter Leb <p>Sie haben eine Ergänzungsvor allgemeine Ann</p> </div>

Figure 8

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
d) the public consultation is for at least 60 days,	Procedures	YES	PEFC D 4001, Ch. 5	60-day (minimum) timeframe is set in Ch. 5 of PEFC D 4001
	Process	YES	4 August to 3 October 2014	Consultation period itself started on August 4 and ended on October 3, 2014.
e) all comments received are considered by the working group/committee in an objective manner,	Procedures	YES	PEFC D 4001, Ch. 5	Ch. 5 of PEFC D 4001 states that “all comments formulated during the seminar and the consultation are documented and discussed within the working groups”.
	Process	YES	SRR, Ch. 7	Ch. 7.2 of SRR refers to the objectiveness of the process of comment review: “A total of 132 comments and modification proposals from the “Würzburg+15” congress and from the online consultation are presented during this last meeting of the WG “Standards”. Each of the submissions is discussed and either taken on or refused. In the latter case, this is written down in the minutes along with an explanatory statement. [These responses are provided to the participants on 12 December 2014 via e-mail and published, see 8.3]”.
(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	PEFC D 4001, Ch. 7	This aspect is addressed in Ch. 7 of PEFC D 4001: “To ensure transparency and public availability, all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany within four weeks after formal approval. The same holds for the report on the revision process, particularly including information on how comments of complaints were dealt with”.

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
	Process	YES	SRR, 8.3	<p>According to Ch. 6.4 of SRR: “The comments are submitted at the bottom of the site of the respective document and permanently saved to ensure transparency also with respect to all previously submitted comments”.</p> <p>According to Ch. 6.5 75 comments were received in online consultation and Ch. 7.2 of SRR “A total of 132 comments <i>were received (online consultation and work shops)</i>. Each of the submissions (<i>each comment</i>) is <i>made publicly available</i>, discussed and either taken on or refused. In the latter case, this is written down in the minutes along with an explanatory statement”.</p> <p>Report on the revision process and comments are available online.</p> <p><i>Italics added by Indufor.</i></p>
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	PEFC D 4001, Ch. 6	Pilot testing is described in Ch. 6 of PEFC D 4001: “In case, the changes in the revised documents are fundamental (e.g. new procedures for individual or group certification) the final draft shall be tested in a pilot project....”
	Process	n.a.	No fundamental changes.	<p>No fundamental changes in the standard PEFC D 1001 on regional certification or 1002-1 on sustainable forest management.</p> <p>Standards on Christmas tree plantations and recreational forests are considered not to be part of the PEFC endorsement. There is no information on the possible pilot testing of the standards PEFC D 1002-2 and PEFC D 1002-3.</p>

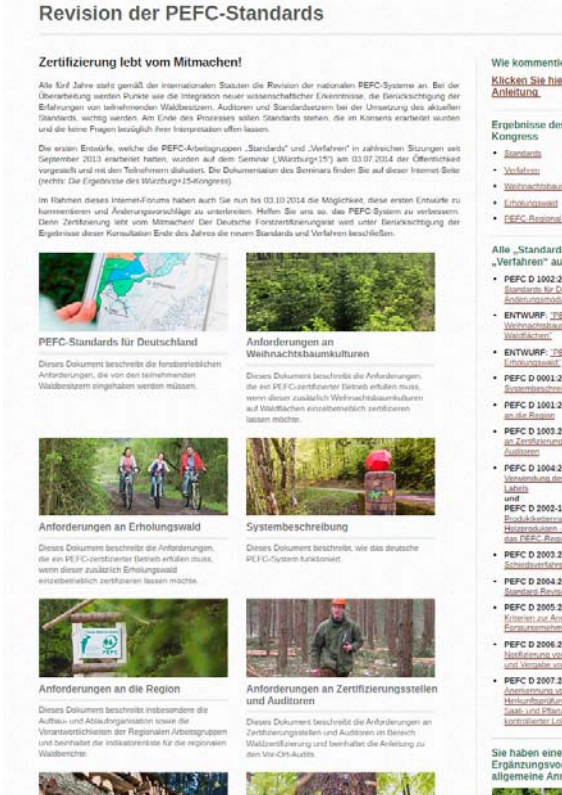
Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
5.8 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus.	Procedures	YES	PEFC D 4001, Ch. 4	<p>A direct reference for that can be found from Ch. 4 of PEFC D 4001: “The decisions of the working group to publish the working draft and to recommend the final draft to the GFCC for formal approval shall be based on consensus”.</p> <p>The chairperson of the working group is responsible for the judgement on whether there is sufficient support. He/ she shall base this judgement on the definition of consensus in the ISO/IEC guideline 2:1996</p>
	Process	YES	SRR, Ch. 7.1 and 7.2	<p>Ch. 7 of SRR states that a consensus was reached regarding the final drafts in the WG “Procedures” and “Standards”.</p> <p><i>The WG decision is made through e-mail statements by each WG member. A consensus was reached.</i></p>
5.8 In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition:				
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	YES	PEFC D 4001, Ch. 4	<p>Such processes directly referred to in Ch. 4 of PEFC D 4001 as “</p> <ul style="list-style-type: none"> a) a face-to face or telephone conference meeting, or combinations of thereof, where there is a verbal yes/no vote; b) a face-to face meeting where there is a show of hands for a yes/no vote; c) a face-to face meeting where there is a “secret ballot” of members on a yes/no vote; d) a statement on consensus by the chairperson at a face-to face

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				meeting where there are no dissenting voices or hands (votes); “ <i>Note text is a copy of a detailed PEFC requirement.</i> ”
	Process	YES	Consensus was reached in face-to-face meetings (SRR, Ch. 5) by showing of hands and a statement on consensus by the Chair. Ch 7.1 and 7.2	A face-to face meeting where there is show of hands for a yes/no vote has been used during the revision process Also email voting was used.
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures	YES	PEFC D 4001, Ch. 4	“A face-to face or telephone conference meeting, or combinations of thereof, where there is a verbal yes/no vote;” as an alternative process according to Ch. 4 of PEFC D 4001.
	Process	YES	Not applied.	Meetings were held face-to face.

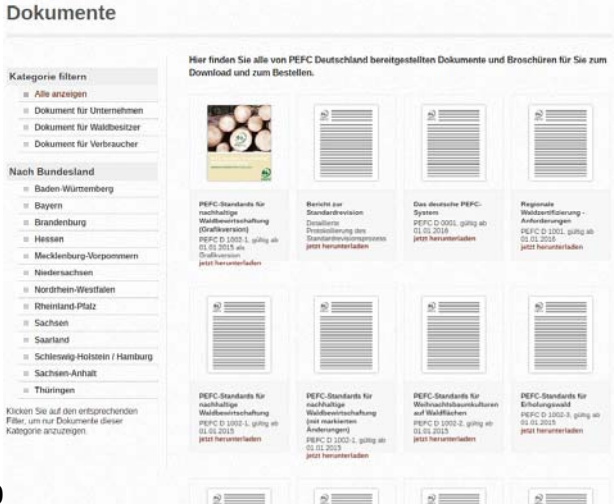
Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or	Procedures	YES	PEFC D 4001, Ch. 4	"An e-mail meeting where a request for agreement is provided to members and the members providing a written response" as an alternative process according to Ch. 4 of PEFC D 4001.
	Process	YES	Applied for stating consensus on the final drafts after having already reached consensus in face-to-face-meetings (SRR, Ch. 7.1. and 7.2).	Ch. 7.1 and 7.2 of SRR state that in order "to ensure that all WG members (including the ones that cannot attend the meeting) support the decision on the final drafts of all relevant documents, this decision is requested to be made in writing via e-mail".
d) combinations thereof.	Procedures	YES	PEFC D 4001, Ch. 4	<i>The different alternatives were described separately</i>
	Process	YES	see c)	During the revision process 2 alternative processes were applied – a face-to face complemented by an e-mail meeting.

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
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	YES	PEFC D 4001, Ch. 4	Ch. 4 of PEFC D 4001: "In case of a negative vote representing sustained opposition of any important part of the concerned interests to a substantive issue, the vote has to be justified. The controversial issue shall be resolved using the following mechanism: a) discussion and negotiation on the disputed issue within the working group in order to find a compromise, " <i>Note a copy of a detailed PEFC requirement.</i>
	Process	n.a.	No sustained opposition.	
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,	Procedures	YES	PEFC D 4001, Ch. 4	Ch. 4 of PEFC D 4001: (contd.) "direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different view on the disputed issue in order to find a compromise, " <i>Note a copy of a detailed PEFC requirement.</i>
	Process	n.a.	No sustained opposition.	

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
c) dispute resolution process.	Procedures	YES	PEFC D 4001, Ch. 4, with reference to PEFC D 2002:2009 (new PEFC D 4005:2014)	Ch. 4 of PEFC D 4001: (contd.) “dispute settlement process” which also refers to the document PEFC D 2003:2009.
	Process	n.a.	No sustained opposition.	
5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.	Procedures	YES	PEFC D 4001, Ch. 7	A provision for public availability of documentation is included into Ch. 7 of PEFC D 4001: “To ensure transparency and public availability, all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany within four weeks after formal approval. The same holds for the report on the revision process, particularly including information on how comments of complaints were dealt with”.
	Process	YES	SRR, Ch. 8.4	A set of <u>drafts</u> has been uploaded from the PEFC Germany’s webpage:

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				<p>Revision der PEFC-Standards</p> <p>Zertifizierung lebt vom Mitmachen!</p> <p>Alle fünf Jahre steht gemäß der internationalen Statuten die Revision der nationalen PEFC-Systeme an. Bei der Überarbeitung werden Punkte wie die Integration neuer wissenschaftlicher Erkenntnisse, die Berücksichtigung der Erfahrungen von teilnehmenden Waldbesitzern, Auditors und Standardgremien bei der Umsetzung des aktuellen Standards, wichtig werden. Am Ende des Prozesses sollen Standards stehen, die im Konsens erarbeitet wurden und die keine Fragen bezüglich ihrer Interpretation offen lassen.</p> <p>Die ersten Entwürfe, welche die PEFC-Arbeitsgruppen „Standards“ und „Verfahren“ in zahlreichen Sitzungen seit September 2013 erarbeitet hatten, wurden auf dem Generalkongress (Wärzburg 13/7) am 03.07.2014 der Öffentlichkeit vorgestellt und mit den Teilnehmern diskutiert. Die Dokumentationen des Sommer finden Sie auf dieser Internet-Seite (rechts: Die Ergebnisse des Wärzburg-15-Kongress).</p> <p>Im Rahmen dieses Internet-Forums haben auch Sie nun bis 03.10.2014 die Möglichkeit, diese ersten Entwürfe zu kommentieren und Änderungsvorschläge zu unterbreiten. Helfen Sie uns so, das PEFC-System zu verbessern. Diese Zertifizierung lebt vom Mitmachen! Die Deutsche Forstzertifizierungsstelle wird unter Berücksichtigung der Ergebnisse dieser Konsultation Ende des Jahres die neuen Standards und Verfahren beschließen.</p>  <p>Figure 9</p> <p>The standard revision report has been posted online (<i>Figure 9</i>) and can be retrieved from https://pefc.de/tl_files/dokumente/fuer_waldbesitzer/neue%20Dokument</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				e%20nach%20Standardrevision/Bericht-PEFC-Standardrevision_2013-2014.pdf
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	PEFC D 4001, Ch. 6	A requirement for formal approval of the standards/normative documents is expressed in Ch. 6 of PEFC D 4001: “After the consultation period, the working groups elaborate a final draft based on the comments from the consultations. This draft is presented to the GFCC for approval (according to Ch. 6 Nr. 2f of the statutes).”
	Process	YES	SRR, Ch. 7.3	According to Ch. 7.3 of SRR the GFCC formally approved all new scheme documents during the Meeting of the Council on November 26, 2014.
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Procedures	YES	PEFC D 4001, Ch. 6	Ch. 7 of PEFC D 4001: “...all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany...”
	Process	YES	SRR, Ch. 8.1 and 8.2	A set of final versions has also been uploaded to the PEFC Germany’s webpage (Figure 10):

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				 <p>Figure 10 A link to access them was published in a press release (December, 1 2014, <i>Figure 12</i>) and a newsletter No 62 (December 17, 2014, <i>Figure 11</i>) and a related newsletter.</p>


Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				<p style="text-align: right;"><i>M. Tschorn</i> Prof. Dr. Ulrich Schwand, Vorsitzender</p> <p style="text-align: right; font-size: small;">PEFC Deutschland e.V. www.pefc.de Newsletter Dezember 2014 1</p> <hr/> <p>PEFC Deutschland verabschiedet neue Standards Portfolio der PEFC-Zertifizierung wird um drei neue Angebote erweitert</p> <p>Der Deutsche Forst-Zertifizierungsrat (DFZR) hat auf seiner Sitzung am 26.11.2014 in Berlin einstimmig die neuen PEFC-Standards verabschiedet. Die wichtigsten Änderungen am PEFC-Waldstandard, der am 01.01.2015 in Kraft tritt, betreffen die Punkte 6.2 (Private Selbstwerber) und 6.4 (Forstunternehmerzertifikate).</p> <p>Darüber hinaus wurde der Startschuss zu einer „Regionenoffensive“ gegeben, um die regionalen PEFC-Arbeitsgruppen zu stärken. Hierzu werden insgesamt sieben neue Stellen, sog. „Regionalassistenten“ geschaffen, die die regionalen Arbeitsgruppen bei ihren Aufgaben unterstützen sollen.</p> <p>Der DFZR verabschiedete auch drei neue Zertifizierungsangebote, die ab kommenden Jahr das PEFC-Portfolio sinnvoll erweitern: eine Zertifizierung von Weidenbaumkulturen auf Waldflächen, ein zusätzliches PEFC-Zertifikat für Erholungswälder (beides auf einzelbetrieblicher Basis) sowie ein Regional-Label „Heimisches Holz aus Ider-Region“.</p> <p>Alle neuen Dokumente können Sie unter http://www.pefc.de/pefc15 oder auf www.pefc.de/dokumente abrufen. Weitere Informationen zur Standardrevison unter http://www.pefc.de/pefc15</p> <div style="float: right; border: 1px solid black; padding: 5px; text-align: center;">  </div>

Figure 11


Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
				 <p>The screenshot shows a news article from PEFC Germany. The main headline is 'PEFC Deutschland verabschiedet neue Standards'. Below it, a sub-headline reads 'Portfolio der PEFC-Zertifizierung wird auf drei neue Angebote ausgeweitet'. There is a small image of several PEFC-certified wood products. The text describes the revision process of the standards, mentioning a 14-month process and the involvement of stakeholders. It highlights the expansion of the certification portfolio to include private labels (Punkte 0.2) and forest management certificates (0.4). The article also mentions the 'Regionaloffensive' strategy to support regional PEFC certification and the introduction of new voluntary certification options for wood products and forest management. At the bottom, there is a 'Zurück' (Back) link.</p>

Figure 12

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
Revisions of standards/normative documents				
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	YES	SRR, Ch. 1	<p>The previous revision process was carried out in November 2009, while the most recently revised documents were approved and published by December 2014 – an interval of 5 years.</p> <p>The procedures for the revision of the standards/normative documents have followed those set out in chapter 5.</p>
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	Process	YES	SRR, Ch. 7.3	According to the Ch. 7.3 of SRR upon approval of the new documents the GFCC also set a transition date – December 1, 2014 – January 1, 2016 (the latter being an application date).
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	NO	The SFM standards (PEFC D 1001, PEFC D 1002-1;	<p>The standard on regional certification PEFC D 1001 had a 13 month period between standard publication of 1 Dec 2014 and its entry into force 1 Jan 2016.</p> <p>One month extension of the application period of PEFC D 1001 standard is noted as a comment.</p>
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the	Process	NO	PEFC S 1001 PEFC D	The two standards for regional and FMU level forest management do not have a specified transition period with dates.

Question	Assess. basis*	YES /NO*	Reference to application documents	Comment
implementation of the revised standards/normative documents requires a longer period.			1002-1	<i>Considered as a minor non-conformity</i>

3 Application documentation

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

2 Checklist

Referred GFCS documents

Regional forest management certification – Requirements.	PEFC D 1001:2014
PEFC standards for Christmas tree plantations on forest land.	PEFC D 1002-2:2014
PEFC standards for recreational forest.	PEFC D 1002-3:2014
Requirements for bodies providing audits for recreational forest.	PEFC D 1003-3:2014
Requirements for bodies providing audits for Christmas tree plantations on forest land.	PEFC D 1003-2:2014

Question	YES / NO*	Reference to system documentation	
General			
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,	YES	PEFC D 1001:2014, Ch. 3.5	Ch. 3.5 of PEFC D 1001 provides a definition of a “Regional organisation” – “A group of participants within a specified geographical area represented by a regional working group for the purposes of implementation of the sustainable forest management standard and its certification”. <i>Group certification is possible only under the regional certificate.</i>

Question	YES / NO*	Reference to system documentation	
b) the group entity,	YES	PEFC D 1001, Ch. 3.5, 5.1.2	<p>Ch. 3.5 Regional organisation</p> <p>A group of participants within a specified geographical area represented by a regional working group for the purposes of implementation of the sustainable forest management standard and its certification.</p> <p>Ch. 5.1.2 The regional working group shall establish a body with overall responsibility for the regional working group. This body shall include representatives of different forest ownerships and structures of the region and shall provide for an appropriate access of other relevant stakeholders.</p>
c) the participant,	YES	PEFC D 1001, Ch. 3.6, 5.2.1	<p>Ch. 3.6 of PEFC D 1001 provides a definition of a “participant” – “A forest owner/ manager or other entity covered by the regional forest certificate, who has the legal right to manage the forest in a clearly defined forest area and the ability to implement the requirements of the sustainable forest management standard in that area”. <i>Note 2: The term „participant“ also includes forestry unions representing their members in a regional certification</i></p> <p>Ch. 5.2.1</p> <ul style="list-style-type: none"> a) an individual forest owner according to the federal forest law; b) a business unit of a forest owner (5.2.1a). The business unit shall have its own forest management planning and shall be solely responsible for forest management of the defined forest area; c) a forest owners association whose members jointly participate in the certification d) forest owners participating through a forest owners association acting as an intermediary body.

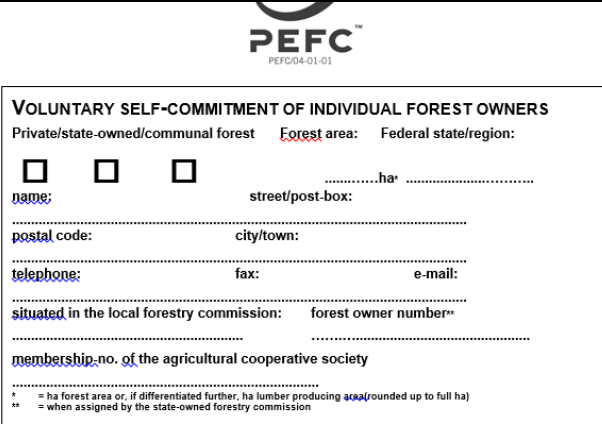
Question	YES / NO*	Reference to system documentation	
d) the certified area,	YES	PEFC D 1001, Ch. 3.1	Ch. 3.1 of PEFC D 1001 provides a definition of a “certified area” – “The forest area covered by a regional forest certificate representing the sum of forest areas of the participants”.
e) the group forest certificate, and	YES	PEFC D 1001, Ch. 3.3	Ch. 3.3 of PEFC D 1001 provides a definition of a “Regional forest certificate” – “A document confirming that the <u>regional organisation</u> complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certification scheme”.
f) the document confirming participation in group forest certification.	YES	PEFC D 1001, Ch. 3.7	Ch. 3.7 of PEFC D 1001 provides a definition of a “Confirmation for participation in regional organisation”: “A document issued to an individual participant that refers to the regional forest certificate and that confirms the participant as being covered by the scope of the regional forest certification”.
4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification scheme is addressed in any other forest management certification scheme that covers the forest owner.	NO	PEFC D 1001, Ch. 4.5 and 4.6	<p>According to Ch. 4.5 of PEFC D 1001 “Where a single forest property is located in more than one region, it shall either (i) participate with the whole forest area in the regional organisation to which prevailing forest area belongs or (ii) <u>the area shall be divided and participate in the respective regional organisations</u>”</p> <p>4.6 The participant shall participate in the regional organisation with the whole forest area located in the respective region</p> <p><i>German PEFC scheme ensures that a specific forest area would not be covered by more than one certification (i.e. a specific forest area is always affiliated to only one regional certification).</i></p> <p><i>Major non-conformity</i></p> <p><i>Although most forest owners have forests only under one regional certificate,</i></p>

Question	YES / NO*	Reference to system documentation	
			<i>large institutional owners may have forest estates certified in different regions. The GFCS does not currently require that non-conformities identified in one certification are disclosed to the other regions where the owner has certified forests. A procedure for such information exchange should be in place.</i>
4.1.3 The forest certification scheme shall define requirements for group forest certification which ensure that participants' conformity with the sustainable forest management standard is centrally administered and is subject to central review and that all participants shall be subject to the internal monitoring programme.	YES	PEFC D 1001, Ch. 4.2 and 7.1.	Ch. 4.2 of PEFC D 1001 states that “the regional organisation has an overall responsibility for the implementation of the requirements of this document and participant’s compliance with the requirements for sustainable forest management as defined in PEFC D 1002-1”, The same idea is expressed in Ch. 7.1.1.4 of PEFC D 1001 “The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification using: results of the internal monitoring programme (Ch. 7.1.2.2);” The internal monitoring programme itself is described in Ch. 7.1.2.2.
4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.	YES	PEFC D 1001, Ch. 7.1.2.2.3 – 7.1.2.2.6	According to Ch. 7.1.2.2.3 of PEFC D 1001: “the regional working group shall establish an internal audit programme evaluating the participants’ compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage” and Ch. 7.1.2.2.4 - “The internal audit programme shall <u>annually</u> provide on-site evaluation...”. Ch. 7.1.2.2.5 lists elements of internal audit

Question	YES / NO*	Reference to system documentation	
Functions and responsibilities of the group entity			
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	PEFC D 1001, Ch. 4.3	These obligations of the group entity are described in Ch. 4.3 of PEFC D 1001: “The regional working group shall take joint responsibility for the communication and relationship with the certification body and the submission of an application for certification. The working group is the holder of the regional certificate”.
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;	NO	PEFC D 1001, Ch. 7.1.1.1 PEFC D 1003-2, Ch. 5.2 and PEFC D 1003-3, Ch. 5.1	Ch. 7.1.1.1 of PEFC D 1001 states that “the regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region”. Ch. 5.2 of PEFC D 1003-2 states that the client applying for certification of a Christmas tree plantation and who is also responsible for the management of other forest areas shall participate in the regional certification ... Ch. 5.3 of PEFC D 1003-3 <i>has similar requirement for applicants for certification of recreational forests.</i> <i>Note that although applicant for Christmas tree plantations or recreational forest certification is committed to comply with PEFC D 1001, the Regional Working Group has no responsibility for individual certification against PEFC D 1002-2 and PEFC D 1002-3. Also <u>non-conformities to the standards on</u></i>

Question	YES / NO*	Reference to system documentation	
			<p><i>recreational and/or Christmas tree forest management are not relevant to the participation in a regional certification</i></p> <p><i>Thus there is no assurance that internal monitoring and other group administration covers the two special certifications. For this reason and for the fact that the PEFC in general and PEFC labelling in particular do not recognize the special certification that add on to the standard SFM certification, the inclusion of PEFC D 1002-2 and PEFC D 1002-3 to the scope of the endorsed PEFC scheme is considered as a major non conformity.</i></p>
<p>c) To establish written procedures for the management of the group organisation;</p>	<p>YES</p>	<p>PEFC D 1001, Ch. 7.1.1.7</p>	<p>The management of the group organisation covers all requirements for responsibilities of the Regional Working Group: PEFC D 1001, Ch. 6.1 and 7.1 and the procedures for the "management of the group organisation" shall cover all elements listed in these chapters.</p> <p>In addition Ch. 7.1.1.7 of PEFC D 1001 states that the regional working group shall establish written procedures for the management of the regional certification".</p>
<p>d) To keep records of:</p> <ul style="list-style-type: none"> - the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme, - all participants, including their contact details, identification of their forest property and its/their size(s), 	<p>YES</p>	<p>PEFC D 1001, Ch. 7.1.1.8</p>	<p>Ch. 7.1.1.8 of PEFC D 1001 refers to such records: "The regional working group shall keep up-to-date records that cover:</p> <ul style="list-style-type: none"> a) the participants, including their contact details, respective forest area; self-commitments received and the confirmations issued; b) total forest area (certified area) of the region; c) records relating to the objectives and action programme, its implementation, monitoring and review; d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures; e) the complaints and appeals mechanism".

Question	YES / NO*	Reference to system documentation	
<ul style="list-style-type: none"> - the certified area, - the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken; 			
<p>e) To establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the sustainable forest management standard;</p>	YES	PEFC D 1001, Ch. 4.4, 6.3.5	<p>Ch. 4.4 of PEFC D 1001 sets a requirement for a written agreement: "The participation in the regional organisation is based on a written agreement between the regional working group and the participant represented by a written commitment of the participant and a written confirmation on participation in the regional certification issued by the regional working group" (<i>Figure 13</i>).</p> <p>6.3.5 The confirmation can be suspended or terminated by the decision of the regional working group based on persisting non-conformity of the participant with the requirements for the regional certification defined in PEFC D 1001 and PEFC D 1002-1. The withdrawal of the confirmation by the regional working group shall be effected by a formal letter.</p>

Question	YES / NO*	Reference to system documentation	
			 <p>With my signature, I commit myself to comply with the PEFC standards for sustainable forest management (PEFC D 1002-1) as currently applicable (see www.pefc.de). To take part in the regional certification, I will comply with the requirements of PEFC D 1001. I will fully cooperate with and support the regional working group and the certification body, effectively answer their questions regarding relevant data, documentation and other information, allow access to my forests and other facilities where necessary for internal and external audits or other relevant assessments. Furthermore, I will implement measures defined in the regional action plan relevant to the participants of the regional certification; I will also implement relevant corrective and preventive measures imposed by the regional working group.</p> <p>I agree that the details on my forest property given above are forwarded to the respective registration body and certification body and published by them.</p> <p>I assert that I have not been rejected from a certification scheme.</p> <p>In the usage of the PEFC logo I will comply with the PEFC Logo usage rules PEFC D ST 2001 and with the logo usage contract with PEFC Germany.</p>
f) To provide participants with a document confirming participation in the group forest	YES	PEFC D 1001, Ch. 6.3	<p>PEFC D 1001 includes a clear statement on the termination of participation Ch. 6.3.5: The confirmation can be suspended or terminated by the decision of the regional working group based on persisting non-conformity of the participant.</p> <p>Ch. 6.3.1 of PEFC D 1001 points out this aspect: “the confirmation of participation in the regional certification (the confirmation) shall be issued to</p>

Question	YES / NO*	Reference to system documentation	
certification;			the participant after the issuance of the regional certificate to the regional working group”.
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	PEFC D 1001, Ch. 7.1.2.1	Ch. 7.1.2.1 of PEFC D 1001: “The regional working group shall provide the participants with detailed information, appropriate guidance and technical assistance, as appropriate, relating to: a) requirements for the regional certification (PEFC D 1001); b) requirements for the sustainable forest management (PEFC D 1002-1) and their implementation; c) PEFC Logo usage rules (PEFC ST 2001); d) the objectives and the action programme, in particular those measures directly affecting the participants; e) Summary results of internal monitoring programme and respective preventive measures”.
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements, and;	YES	PEFC D 1001, Ch. 7.1.2.2	The annual internal monitoring programme is described in Ch. 7.1.2.2 of PEFC D 1001.
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	PEFC D 1001, Ch. 7.1.2.3	Corrective and preventive measures and the evaluation of the effectiveness of corrective actions taken are described in Ch. 7.1.2.3 of PEFC D 1001. Review of conformity with the sustainable forest management standard is performed in the framework of the annual internal monitoring programme described in Ch. 7.1.2.2 of PEFC D 1001.

Question	YES / NO*	Reference to system documentation	
Function and responsibilities of participants			
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	PEFC D 1001, Ch. 6.2	A written agreement which a participant has to submit is Ch. mentioned in Ch. 6.2 of PEFC D 1001: "The potential participant covered by 5.2.1 a, b, shall submit to the regional working group the self-commitment specified in annex 2, Part I." <i>See Question 4.2.1. e) for an example</i>
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	PEFC D 1001, Ch. 7.2 b)	Ch. 7.2 of PEFC D 1001: "The participant in the regional certification shall: a) be committed to comply with the requirements for the regional certification (annex 2); b) comply with applicable requirements for the regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1); requirements for the PEFC Logo usage (PEFC ST 2001) and other measures identified in the action programme applicable to the participant;"
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;	YES	PEFC D 1001, Ch. 7.2 c)	Ch. 7.2 of PEFC D 1001: (contd.) "provide full co-operation and assistance in responding effectively to all requests from the regional working group or a certification body for relevant data, documentation or other information; allowing access to his forests and other facilities, whether in connection with internal and external audits, or reviews, or otherwise;" <i>A copy of PEFC requirement.</i>

Question	YES / NO*	Reference to system documentation	
d) To implement relevant corrective and preventive actions established by the group entity.	YES	PEFC D 1001, Ch. 7.2 d)	Ch. 7.2 of PEFC D 1001: (contd.) “implement relevant corrective and preventive actions established by the regional working group;” <i>A copy of PEFC requirement</i>

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

German PEFC Scheme has two hierarchical standards for forest management applied at the levels of a regional and a forest management unit:

- PEFC D 1001:2014 Regional Forest Management Certification – Requirements
- PEFC D 1002-1: 2014 PEFC Standards for Sustainable Forest Management

The standard for recreational forests (PEFC D 1002-3: 2014 PEFC) sets additional requirements to PEFC D 1002-1 for the management of recreational forests. The additional requirements for Christmas tree plantations are stated in the PEFC D 1002-2:2014 (PEFC Requirements for Christmas Tree Plantations on Forest Land).

Forest owners are allowed to hold a certificate for recreational forest (PEFC D 1002-3) or Christmas tree plantations (PEFC D 1002-2) only if they are participants in regional certification and comply with PEFC D 1002-2 standard. The assessment includes the requirements of the two standards although the assessor recommends that the PEFC endorsement does not cover the certificates issues against these standards. (see Part II 4.2.1 b) for the explanation).

Other GFCS documents referred to in Part III include

- PEFC D 0001 The German forest certification scheme - System description,
- PEFC D 1003-1:2014 Requirements for bodies providing audits for regional certification

2 Checklist

Question	YES / NO*	Reference to scheme documentation	
General requirements for SFM standards			
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	YES	PEFC D 1001 on Regional certification Ch 7.1.1.4 PEFC D 1002-1:2014	According to Ch. 7.1.1.3 of PEFC D 1001 the Regional Working Group has to define operational and measurable objectives which are achievable within a specific timeframe. Action programmes define how to reach the objectives. The objectives are

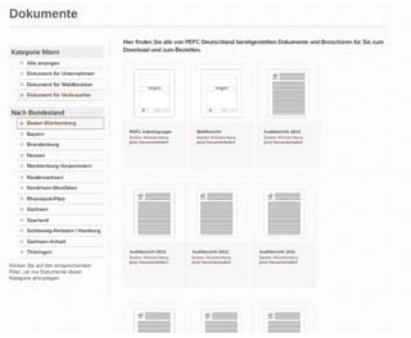
Question	YES / NO*	Reference to scheme documentation	
requirements is achieved at the forest management unit level.		<p>for FMU level and PEFC D 1001:2014, Annex 1 for regional level</p> <p>PEFC D 1002-2:2014 for Christmas tree plantations</p> <p>PEFC D 1002-3 Recreational forests</p>	<p>linked to the status of indicators in the regional forest report.</p> <p>PEFC D 1001 Ch. 7.1.1.4 requires that the participants' compliance with the requirements for the regional certification using:</p> <ul style="list-style-type: none"> a) results of the internal monitoring programme (Ch. 7.1.2.2); b) information from parties responsible for the implementation of the specific measures of the action programme; c) information and data from other parties and external sources relevant to the objectives and the action programme. <p>PEFC D 1002-1, 1002-2 and 1002-3 include performance requirements that are applicable at a FMU level</p> <p><i>Regional action programme together with PEFC D 1002-1 (or the standards for Christmas tree and recreational forests) set the FMU level requirements.</i></p>
b) be clear, objective-based and auditable.	YES	<p>PEFC D 1002-1 SFM</p> <p>PEFC D 1002-2 Christmas tree</p> <p>PEFC D 1002-3 Recreational</p> <p>PEFC D 1001 - Regional</p>	<p><i>Forest management unit level standards for SFM, recreational forests and Christmas tree plantations are clear, objective based and auditable.</i></p> <p><i>In regional certification the standard sets generic objectives that are specified in regional action programmes/plans which, however are not part of this assessment.</i></p>
c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.	YES	<p>PEFC D 0001 System Description</p> <p>PEFC D 1001 Regional</p>	<p>According to 7.2.1.1.5 of PEFC D 0001 the German PEFC scheme requires that certified forest owners/ managers can only use forest contractors that have been certified against a forest contractors' certification scheme that has been endorsed by PEFC Germany. The requirements for the endorsement of</p>

Question	YES / NO*	Reference to scheme documentation	
		Certification	<p>forest contractors' certification scheme are defined in PEFC D 4004.</p> <p>Annexes to PEFC D 1001 on self-commitment require compliance with 1002-1 (FMU standard).</p> <p><i>Certification of recreational forests/Christmas tree plantations is conditional to valid participation in regional certification. When a forest owner loses its "participation status" in the regional certification, it automatically does not conform to the requirements for the "recreational/Christmas tree" certification. Non-conformities with the additional recreational/ Christmas tree standards do not imply a withdrawal of a regional certificate, if compliance with PEFC D 1002-1 standard is still in place.</i></p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.	YES	PEFC D 1001, Ch. 7.1.1.8	<p>Ch. 7.1.1.8 of PEFC D 1001: "The regional working group shall keep up-to-date records ... on records relating to the objectives and action programme, its implementation, monitoring and review;</p> <p>d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;</p> <p><i>The regional level record keeping obligation covers also Christmas tree and recreational forest management.</i></p>
Specific requirements for SFM standards			
Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle			
5.1.1 Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of the economic, ecological, cultural and social	YES	PEFC D 1002-1 SFM, sec... 1.1; PEFC D 1001, Annex	Ch. 1.1 of PEFC D 1002-1, 1002-2 states that "forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures

Question	YES / NO*	Reference to scheme documentation	
values of forest resources, including soil and water. This shall be done by making full use of related services and tools that support land-use planning and nature conservation.		1, indicator 12 = PEOLG 1.1 b)-c) PEFC D 1002-2 Christmas PEFC D 1002-3 Recreation	the strategic balancing of harvesting and growth rates on the long term (see guidance 1). PEFC D indicators 12/PEOLG: b) Inventory and mapping of forest resources should be established and maintained, adequate to the local and national conditions, and in correspondence with the topics described in these Guidelines. c) Management plans or their equivalents, appropriate to the size and use of the forest area, should be elaborated and periodically updated. They should be based on legislation as well as existing land use plans, and adequately cover the forest resources. d) Monitoring of the forest resources and evaluation of their management should be periodically performed, and their results should be fed back into the planning process.
5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.	YES	PEFC D 1001, Ch. 5.1.2, Ch.. 7.1.1.2 to Ch. 7.1.1.4 on regional indicators and action programme PEFC ST 1003, Ch. 4 PEFC D 1002-1 Guidance 1	Ch. 7.1.1.2 of PEFC D 1001 "Regional Forest Report shall be based on ... forest inventories and other data sources. ...the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory and shall be completed within one year after the publication of the results of the same." <i>Social, environmental and economic criteria are part of the list of PEOLG indicators the regional forest reports are based on (PEFC D 1001, Annex 1). The indicators describe the social, environmental and economic impact of forest management and periodic regional forest reports make an assessment of the social, environmental and economic impacts of the forest management within the region as required by Ch. 5.1.2. of PEFC D 1001,</i> <i>Ch.. 7.1.1.3 requires that the regional forest report forms the basis for</i>

Question	YES / NO*	Reference to scheme documentation	
			<p><i>objectives and specific measurable actions which applies for all participants in the region (FMU level) thus setting requirements for social and environmental performance.</i></p> <p><i>PEFC ST 1003, Ch.. 4.1 a) that allows the requirements to be defined at another level than FMU provided that the intent of the requirement is achieved at the FMU level.</i></p> <p>Guidance 1 FMUs > 100 ha shall have a forest management plan with specific requirements. Smaller holdings shall have plans with</p> <ul style="list-style-type: none"> - registers on wooded areas, maps, inventory of stocking, allowable cut. - FMUs without a plan shall present targets and plans for harvesting and regeneration.
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	PEFC D 1001, Annex 1, indicator 12 = PEOLG 1.1 b)-c) PEFC D 1002-1, Ch. 1.1 and Guidance 1 PEFC D 1002-3 Recreation Ch. 5.1	PEOLG 1.1 b) Inventory and mapping of forest resources should be established and maintained Guidance 1 of PEFC D 1002-1 and 1002-2 advices that a forest management plan should include maps and inventories of increment and stocking among others. Recreational forest shall have a strategy to improve recreational values and comply with the PEFC D 1002-1 requirements (see PEFC 1002-3, Ch. 5.1). <i>Social and environmental aspects (partly) are addressed in Regional action programmes and their implementation activities.</i>
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	YES	PEFC D 1002-1 SFM , Ch. 1.1 and Guidance 1;	PEFC D 1001 Annex 1 PEOLG 1.1 c) Management plans or their equivalents, appropriate to the size and use of the forest area, should be elaborated and periodically updated

Question	YES / NO*	Reference to scheme documentation	
as well as existing land-use plans, and adequately cover the forest resources.		PEFC D 1001 Regional, Ch. 7.1.1.2; PEFC D 1001, Annex 1, indicator 12 PEFC D 1002-2 Christmas trees, Ch. 1.1 and Guidance 1 PEFC D 1002-3 Recreation?	Ch. 7.1.1.2 of PEFC D 1001 "...shall prepare a Regional Forest Report that provides information on the sustainable forest management in the entire region. ...shall: a) cover the indicators for sustainable forest management defined in annex 1 (= PEOLG etc.); b) provide information on the state of forests of the entire region; c) identify areas for improvement of the sustainable forest management within the region; d) ... The preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (10 year cycle) and shall be completed within one year after the publication of the results of the same. Ch. 1.1 of PEFC D 1002-1 and PEFC D 1002-2 Guidance 1 also require a forest management plan: "Forest management plans. ...They incorporate ecological, economic and social targets in terms of PEFC. <i>In Germany the normal revision period of FMU level plans are ten years.</i>
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	PEFC D 1002-1, Ch. 1.1 and Guidance 1; PEFC D 1001, Ch. 7.1.1.2; PEFC D 1001, Annex 1, indicator 12 PEFC D 1002-2, Ch. 1.1 and Guidance 1	Guidance 1 of PEFC D 1002-1 and PEFC D 1002-2 determine the content of FM plans. They should include -among other aspects - stand descriptions, definition of targets and calculation of the allowable cut. Ch. 7.1.1.2 of PEFC D 1001 determines that forest plans should "provide information on the state of forests of the entire region, be based on information and data from forest inventories and other data sources and identify areas for improvement of the sustainable forest management within the region".

Question	YES / NO*	Reference to scheme documentation	
			If non-timber forest products are part of the system of targets of a forest owner, they will also be subject of the medium-term planning (normally 10 years).
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	PEFC D 1001, Ch. 7.1.1.2; the entire Regional Forest Reports are made publicly available on www.pefc.de (Note: PEFC ST 1003, Ch. 4.1 a) allows to set requirements not only at the FMU level but also "at another level as appropriate to ensure that the intent of all requirements is achieved at the forest management unit level".)	Regional forest reports are published on the website of PEFC Germany (Figure 14): Figure 14 
5.1.7 Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.	YES	PEFC D 1001, Ch. 5.1.7, 7.1.1.2, 7.1.1.4 Ch. 7.1.2.2 – 7.1.2.6	Ch. 7.1.1.2 of PEFC D 1001 states that "The preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (10 years). Ch. 7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants' compliance with the requirements for the regional certification using:

Question	YES / NO*	Reference to scheme documentation	
			<p>d) results of the internal monitoring programme (Ch. 7.1.2.2);</p> <p>e) information from parties responsible for the implementation of the specific measures of the action programme;</p> <p>f) information and data from other parties and external sources relevant to the objectives and the action programme.</p> <p>This monitoring and assessment shall be carried out by the regional working group</p> <p><i>Ch. 7.1.2.2 – 7.1.2.6 defines the content of monitoring on the compliance with PEFC D 1002-1 that results in review and actions at both FMU as well as regional level.</i></p> <p><i>The periodic revision of the regional forest report makes an assessment of the forest management planning within the region.</i></p> <p><i>PEFC D 1001, Ch. 7.1.1.3 requires that the regional forest report forms the basis for objectives and specific measurable actions which applies for all participants in the region (FMU level).</i></p>
5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	PEFC D 1001, Ch. 6.2.1, Annex 1	<p>Ch. 6.2.1 of PEFC D 1001 states that the potential participant covered by 5.2.1 a, b, shall submit to the regional working group the self-commitment specified in annex 2, Part I.</p> <p>Self-commitment requires compliance with PEFC D 1002-1.</p> <p><i>Applicants for FMU (PEFC D 1002-1), recreational forest (1002-3) and Christmas tree plantations (1002-2) have to sign a self-commitment defining the responsibilities</i></p>
5.1.9 Forest management practices shall safeguard the quantity and quality of the	YES	PEFC D 1001, Annex 1, indicator 15, 12, 13,	For “Quantity of forest resources” see PEFC D 1002-1, Ch. 1.1 (planning secures the strategic balancing of harvesting and growth rates on the long

Question	YES / NO*	Reference to scheme documentation	
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.		17, 20, 26 in regional certification PEFC D 1002-1, Ch.1.1, 1.2, 2.5 to 2.7	term), Ch. 1.2 (maintenance of forest cover, regeneration obligation), and PEFC D 1001, Annex 1, ind. 12, 13, 17, 20; For “Balancing” see PEFC D 1002-1, Ch. 1.1 and PEFC D 1001, Annex 1, ind. 12 (planning), 17 (ratio growth/ harvesting); For “Quality” see PEFC D 1002-1, Ch. 2.6 and PEFC D 1001, Annex 1, ind. 15 (felling and skidding damage); For “Minimising the damage” see PEFC D 1002-1, Ch. 2.5 - 2.7, 5.4, 5.5 and PEFC D 1001, Annex 1, ind. 15, 26 (protective functions); Advised use of machinery, felling and skidding damages are described in Ch. 2.5-2.7 of PEFC D 1002-1 and PEFC D 1002-2, skidding damages included into Annex 1, indicator 15 of PEFC D 1001. <i>The standard PEFC D 1001 should describe in writing the content of the requirements of PEFC D 1001 Annex 1 (PEOLG etc.).</i>
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.	YES	PEFC D 1002-1, Ch. 3.3, 4.1, 4.7. PEFC D 1001, Annex 1, indicator 13	PEFC D 1002-1 refer to silvicultural measures and aim at a desirable stock, e.g. on appropriate tending (Ch. 3.3), on mixed stands (Ch. 4.1) or on natural regeneration (Ch. 4.7).
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: a) is in compliance with national and	YES	PEFC D 1002-1, Scope, para 1 and Ch. 1.3	Ch. 1.3 of PEFC D 1002-1 states that wood stemming from the conversion of forests (change of utilization) can only be declared „PEFC certified“, if the clearing is legally authorised according to nature conservation and forest law. Also Ch. 4.9 and Ch. 6 of PEFC D 1002-1, requires the protection of biotopes and endangered tree / plant species, and the protection of social values, that

Question	YES / NO*	Reference to scheme documentation	
<p>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>prohibit conversion of valuable sites.</p> <p><i>Legislation in Germany on land use planning regulates the conversion of forest to other land use. The legislation includes off-setting requirements for legally converted forests.</i></p>
<p>5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.</p>	<p>YES</p>	<p>PEFC D 1002-1, Ch. 0.1: As forest owners participating in PEFC are obliged to conform to national and regional legislation they have no freedom of action to afforest land. German</p>	<p><i>The conversion of agricultural land to forest is strictly controlled by regulations.</i></p>

Question	YES / NO*	Reference to scheme documentation	
		law clearly distinguishes between agricultural and forest land, so that a requirement to afforest treeless land would discriminate forest owners who do not own any agricultural land. For regions with very low forest cover there are subsidy programmes in place to promote the conversion into forest land.	
Criterion 2: Maintenance of forest ecosystem health and vitality			
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	PEFC D 1001, Annex 1, Indicators 14 limed forest land, 15 felling and skidding damage 16 applied plant protective agents, PEFC D 1002-2, Ch. 2.1, 2.2 PEFC D 3001:2014 Tools for the definition of objectives and regional	Ch. 2.1 of PEFC D 1002-1 Methods of integrated plant protection shall be used Ch. 2.2 of PEFC D 1002-1 Application of plant protective agents is only used as last option, e.g. where the stand or the regrowth is gravely endangered according to the law on plant protection. <i>Criteria on the maintenance of forest ecosystem health and vitality are part of the list of indicators in the regional forest reports (PEFC D 1001 indicators). Periodic revision of regional forest programme and plans and related action programme integrate monitoring and planning of measures to improve forest health into regional and FMU level requirements.</i>

Question	YES / NO*	Reference to scheme documentation	
		action programmes	
5.2.2 Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	PEFC D 1001, Annex 1 indicator 4, 15 PEFC D 1002-1, Ch. 2.5 to 2.7; PEFC D 1002-2, Ch. 2.4 to 2.7	PEFC D 1001 Annex 1 indicators 4 (PEOLG 2.1 b) Health and vitality of forests should be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations and 15 (PEOLG 1.2, 2.1, 2.2, 3.2, 4.2, 5.2) are under the title of felling and skidding damage. Advised use of machinery, felling and skidding damages are described in Ch. 2.5-2.7 of PEFC D 1002-1 and PEFC D 1002-2 <i>Periodic revision of the plan and related action programme integrate monitoring and planning of measures to improve forest health into regional and FMU level requirements.</i>
5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems shall take into consideration the effects of naturally occurring fire, pests and other disturbances.	YES	PEFC D 1001, Annex 1 indicator 4, 15	<i>Disturbances, like fire and pests, cannot be regarded as “natural” effects in forest ecosystems in Germany (in contrast to forests in the boreal zone). As a consequence larger openings in the forest cover as result of clear cuts are not allowed by PEFC in Germany.</i> <i>Annual monitoring/auditing and periodic revision of the plan and related action programme integrate the monitoring of biotic and abiotic damages into the requirements of regional certification.</i>
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	YES	PEFC D 1001 Annex 1 indicators 12, 13 PEFC D 3001 12, 13	PEFC D 1001 Annex 1 12 Forest land under a management plan or equivalent, 13 Growing stock structure (Equal to PEOLG Ch. 1.2) PEFC D 3001 asks to define production targets and measures to engage

Question	YES / NO*	Reference to scheme documentation	
management planning shall make use of those policy instruments set up to support these activities.		PEFC D 1002-1, Ch. 2.5, 2.7 and 4.11; PEFC D 1001, Annex 1, indicator 5 PEFC D 1002-2, Ch. 2.4, 2.5, 2.7 and 4.8	<i>forest owners to them</i> PEFC 1002-1 <i>require prevention of harvesting damages</i>
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.	YES	PEFC D 1002-1, Ch. 4.1; 1.2, 4.6 – 4.8 PEFC D 1001, Annex 1, indicator 20 PEFC D 1002-2, Ch. 4.1, 4.5 and 6.10	Ch. 4.1 of PEFC D 1002-1: "If foreign tree species are mixed, it shall be assured that they do not disturbed by their natural regeneration the regeneration ability of other tree species with the result of their suppression". Ch. 1.2 A permanent forest cover shall be maintained..., i.e. a reduction of stock density beyond a critical level (0.4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy. Ch. 4.6 Regeneration methods adapted to the tree species which shall be regenerated shall be used. Ch. 4.7 Natural regeneration shall be preferred where the expected regeneration is site adapted and satisfactory with respect to quality and quantity and where planting is not necessary for the conversion into a site adapted stocking. Ch. 4.8 Clear cuttings shall be omitted on principle.
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.	YES	PEFC D 1002-1, Ch. 0.1 PEFC D 1002-2, Ch.0.1	<i>The standard documentation has no clause directly mentioning fires, but they contain a reference to relevant national and state legislation, which has a provision on forest fires.</i>

Question	YES / NO*	Reference to scheme documentation	
<p>5.2.7 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied.</p> <p>The spillage of oil during forest management operations or the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.</p>	YES	<p>PEFC D 1002-1, Ch. 2.5 to 2.7, 4.3, 4.4, 4.6 and 5.5;</p> <p>PEFC D 1001, Annex 1, indicator 15, 21 and 28</p> <p>PEFC D 1002-2, Ch. 2.4 to 2.7, 4.2, .4.3 and 5.5</p>	<p>In case of forest seed and plant material PEFC D 1002-1 refers to provenance recommendations, but advises the use of seeds and plants with verifiable origin (Ch. 4.2-4.3 of PEFC D 1002-2 and Ch. 4.3-4.4 of PEFC D 1002-1)</p> <p>PEFC D 1002-1 4.6 Regeneration methods adapted to the tree species which shall be regenerated shall be used.</p> <p>Advised use of machinery, felling and skidding damages are described in Ch. 2.5-2.7 of PEFC D 1002-1 and PEFC D 1002-2.</p> <p>The use of oils is determined in Ch. 5.5 of PEFC D 1002-1 and PEFC D 1002-2.</p> <p>Indicators 15, 21 and 28 of PEFC D 1001 refer to felling and skidding damage, proportion of area registered by site mapping, including the recommendations for the selection of tree species and bio-degradable oils respectively.</p>
<p>5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.</p>	YES	<p>PEFC D 1002-1, Ch. 2.1 and 2.2;</p>	<p>List of authorised plant protection products in forestry¹</p> <p>Regional:</p> <p>Indicators 16 of PEFC D 1001 refer to Applied plant protective agents.</p> <p>SFM</p> <p>Ch. 2.1 of PEFC D 1002-1 requires such methods of plant protection that “minimize the use of chemicals” and Ch. 2.2 states that</p> <p>Application of plant protective agents is only used as last option, e.g. where</p>

¹ http://www.bvl.bund.de/SharedDocs/Downloads/04_Pflanzenschutzmittel/psm_verz_4.pdf?__blob=publicationFile

Question	YES / NO*	Reference to scheme documentation	
		<p>PEFC D 1001, Annex 1, indicator 16</p> <p>PEFC D 1002-2, Christmas trees Ch. 2.1, 2.2 and 2.4</p>	<p>the stand or the regrowth is gravely endangered according to the law on plant protection. Alternative organisational and/ or technical measures are to be preferred. With the exception of the treatment of wood piles and the usage of substances for wound treatment and game damage all cases of application of plant protective requires a written expert opinion (see guidance 2). The application of plant protective is carried out in any case by a person competent to do so according to the law on plant protection.</p> <p>Christmas trees: PEFC D 1002-2 Health and vitality of forest ecosystems :</p> <p>2.1 Methods of integrated plant protection shall be used.</p> <p>a) Integrated plant protection: Combination of procedures giving priority to mechanical, biological, biotechnological, plant breeding as well as cultivation measures in order to minimize the use of chemicals for plant protection. (Ch. 2 plant protection law).</p> <p>2.2 Where the targets of annual plantation tending cannot be reached by means of mechanical and biotic measures, the following rules apply for the utilisation of herbicides:</p> <ul style="list-style-type: none"> • Minimum distance to surface waters shall be 20 metres. • Application of the „50 / 50 rule“: half of the maximal allowed substance or treatment on a maximum of 50% of the plantation surface. • Application of herbicides only up to the 6th year of establishment <p><i>Use of chemicals in Christmas tree plantations is more liberal compared to traditional forest management. Other alternatives for plant protection are looked for in all management regimes.</i></p>

Question	YES / NO*	Reference to scheme documentation	
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.	YES	PEFC D 1002-1, Ch. 0.1 and 2.2; PEFC D 1001, Annex 1, indicator 16 =(PEOLG 5.2.b) PEFC D 1002-2, Ch. 0.1 and 2.2	<p><i>EU requires that Member States comply with EU level legal acts and prohibit the use of toxic chemicals as appropriate. In Germany Pflanzenschutzgesetz (Federal Plant Protection Law) specifies the national requirements.</i></p> <p><i>The valid legislation and the following standard requirements provide evidence on compliance with PEFC requirement.</i></p> <p>Ch. 0.1 of PEFC D 1002-1 and 1002-2 refer to international conventions and the relevant national and state legislation</p> <p>Ch. 2.2 of PEFC D 1002-2 lists rules for the utilisation of herbicides in Ch. 2.2 (see question 5.2.8 above).</p> <p>Indicators 16 of PEFC D 1001 (PEOLG 5.2.b) Special care should be given to forest management practices on forest areas with water protection function 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 should be avoided.</p>
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.	YES	PEFC D 1002-1, Ch. 0.1 and 2.2; PEFC D 1001, Annex 1, indicator 16 PEFC D 1002-2, Ch. 0.1 and 2.2	<i>See above 5.2.9 for justification.</i>
5.2.11 The use of pesticides shall follow the	YES	PEFC D 1002-1,	<i>PEFC D 1002-1 Guidance 2 sets requirements for the competence of persons</i>

Question	YES / NO*	Reference to scheme documentation	
instructions given by the pesticide producer and be implemented with proper equipment and training.		Ch. 0.1 and 2.2, Guidance 2; PEFC D 1002-2, Ch. 0.1 and 2.2	<i>applying pesticides. and The Pflanzenschutzgesetz (Federal Plant Protection Law) 2 covers both requirements for the user (Ch.9) and the use (Ch.12) of pesticides.</i>
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	YES	PEFC D 1002-1, Ch. 2.3 and 2.4 PEFC D 1002-2, Ch. 2.3 and 2.4	A requirement for soil sampling and/or forest nutrition expertise as the basis for soil liming is set in Ch. 2.3 of PEFC D 1002-1 and 1002-2.
Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)			
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	PEFC D 1001, Annex 1, indicator 29 (PEOLG 3.1.a, 3.1.b, 3.2.a , 3.2.c II) PEFC D 1002-1, SFM Ch. 1.1, 3.2 and 3.3; PEFC D 1002-2 Christmas tree, Ch. 3.2 and 3.3 PEFC D 1002-3	PEFC D 1001/ PEOLG 3.2 a 3.2 Guidelines for Forest Management Practices a. Forest management practices should be ensured in quality with a view to maintain and improve the forest resources and to encourage a diversified output of goods and services over the long term. PEFC D 1002-1 and 1002-2: Ch. 1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC (see Guidance 1) Ch.3.2 of: “The forest owner shall manage his forests in a product-oriented

² http://www.gesetze-im-internet.de/bundesrecht/pflschg_2012/gesamt.pdf

Question	YES / NO*	Reference to scheme documentation	
		Recreation Stage 2, 1.2	<p>way, also with respect to the marketing of non-wood-products and services.”</p> <p>Ch. 3.3 An appropriate tending of stands adapted to the internal objectives shall be ensured.</p> <p>PEFC D 1002-3 1.2 Recreational strategy – <i>address forests capability to produce recreational services</i></p>
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<p>PEFC D 1001, Annex 1, indicator 29 (PEOLG 3.1 b)</p> <p>PEFC D 1002-1, Ch. 3.1 and 3.2; PEFC D 1002-2, Ch. 3.1 and 3.2</p> <p>PEFC D 1002-3</p>	<p>PEFC D 1001/ PEOLG 3.1. b: Forest management planning should aim to achieve sound economic performance taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.</p> <p>Ch.3.2 of PEFC D 1002-1 and 1002-2: “The forest owner shall work towards a high added value and economic success”.</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>PEFC D 1001, Annex 1, ind. 27</p> <p>PEFC D 1002-1, Ch. 1 and 3; PEFC D 1002-2, Ch. 1 and 3</p>	<p>PEFC D 1001 indicator 27 Total expenditures for long-term sustainable services from forests</p> <p>Standards PEFC D 1002-1 and 1002-2 Ch. 1 state that FM plans should incorporate ecological, economic and social targets in terms of PEFC. In addition the standards set specific requirements for the different functions under criteria 3, 4, 5, and 6.</p> <p>Ch. 1 of PEFC D 1002-1 and 1002-2 is on the productive function of forests, which also incorporates non-commercial forest goods and services.</p> <p>PEFC D 1002-3 specifies the additional requirements for recreational forests.</p>
5.3.4 Forest management practices shall maintain and improve the forest resources	YES	PEFC D 1002-1, Ch. 3.1 and 3.2; PEFC	Ch. 3.1-3.2 of PEFC D 1002-1 and PEFC D 1002-2 determine that a forest owner shall aim for a high added value and economic success and produce

Question	YES / NO*	Reference to scheme documentation	
and encourage a diversified output of goods and services over the long term.		D 1001, Annex 1, indicator 29 PEFC D 1002-2, Ch. 3.1 and 3.2	“high timber qualities and a varied product palette within the internal objectives”.
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	PEFC D 1001, Annex 1, indicator 15 and 18 (PEOLG 1.2.a II, 2.1.b, 2.2.bII, 3.2.b II, 4.2.e I, 5.2.a I) PEFC D 1002-1, Ch. 2.5 to 2.7; PEFC D 1002-2, Ch. 2.4 to 2.7	Indicators 15 and 18 of PEFC D 1001 refer to felling and skidding damage, as well as to Tending areas. PEFC D 1002-1 Ch. 3.3 An appropriate tending of stands adapted to the internal objectives shall be ensured. PEFC D 1002-1 and PEFC D 1002-2 Ch. 2.5-2.7: Appropriate use of machinery and avoidance of felling and skidding damages.
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	PEFC D 1001, Annex 1, indicator 17 (PEOLG 1.2.a I, 3.2.c I) and 29 (PEOLG 3.2.c) PEFC D 1002-1, Ch. 1.1, 3.2 and 3.4, incl. Guidance 1; PEFC D 1002-2, Ch. 1.1, 3.2 and 3.4	PEOLG 3.2. c:Harvesting levels of both wood and non-wood forest products should not exceed a rate that can be sustained in the long term, and optimum use should be made of the harvested forest products, with due regard to nutrient offtake. PEFC D 1002-1 Ch.1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures the strategic balancing of harvesting and growth rates on the long term (see guidance 1: management plan shall include... Calculation of the allowable cut). PEFC D 1002-1, 1002-2 Ch. 3.2 The encouragement of the productive function includes the production of high timber qualities and a varied product palette within the internal objectives. The forest owner shall manage his

Question	YES / NO*	Reference to scheme documentation	
			<p>forests in a product-oriented way, also with respect to the marketing of non-wood-products and services</p> <p>PEFC D 1002-1 Ch. 3.4 The final felling of non-mature stands is principally omitted.</p> <p>PEFC D 1002-2 3.4 Single-tree harvest is permitted as from the fifth year of plantation establishment. The rotation period for Christmas tree plantations is at least nine and no more than 20 years.</p> <p><i>The standard does not set requirements to regulate harvesting levels of non-wood products. Currently non-wood products are not marketed as PEFC certified and the scheme has not considered it relevant to set requirements on harvesting control on any potential non-wood product.</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.	n.a.		In Germany hunting and fishing is regulated, monitored and controlled by the state.
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.	YES	<p>PEFC D 1001, Annex 1, indicator 7</p> <p>PEFC D 1002-1, Ch. 3.5;</p> <p>PEFC D 1002-2, Ch. 3.5</p> <p>PEFC D 1002-3 2.2</p>	<p>PEFC D 1001 / PEOLG 3.2 d Adequate infrastructure, such as roads, skid tracks or bridges should be planned, established and maintained to ensure efficient delivery of goods and services while at the same time minimising negative impacts on the environment.</p> <p>Ch. 3.5 of PEFC D 1002-1 and 1002-2 requires “the accessibility of the forests adapted to the demand”.</p> <p>Indicator 7 of PEFC D 1001 refers to the density, construction and maintenance of forest roads.</p> <p>PEFC D 1002-3 2.2 infrastructure set up as part of the recreational strategy is</p>

Question	YES / NO*	Reference to scheme documentation	
			in good condition and is regularly checked and maintained.
Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems			
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.	YES	PEFC D 1001, Annex 1, indicator 23, 25 (PEOLG 4.1.a, 4.1.b, PEFC D 1002-1, Ch. 4.1, 4.2, 4.8, 4.9; PEFC D 1002-2, Ch. 4.6, PEFC D 1002-3 - no reference to biodiversity	Indicators 23, 25 of PEFC D 1001: 4.1.a Forest management planning should aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level and, where appropriate, - diversity at landscape level... <i>Copy of the PEFC requirement</i> 4.1 b Forest management planning and terrestrial inventory and mapping of forest resources should include ecologically important forest biotopes, PEFC D 1002-1 Ch. 4.1 Apart from naturally pure stands, mixed stands with site adapted tree species shall be maintained / established. Ch. 4.2 Rare tree and shrub species shall be promoted Ch. 4.9, PEFC D 1002-2 4.6 Forest management shall take special care of protected biotopes or areas as well as of endangered tree and plant species. <i>Annual monitoring/auditing and periodic revision of the Regional plan and related action programme integrate the landscape level biodiversity protection into the requirements of regional certification.</i>
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: a) protected, rare, sensitive or	YES	PEFC D 1002-1, Ch. 4.9, 5.2; PEFC D 1001, Annex 1, indicator 26 (PEOLG 5.1.b) PEFC D 1002-2,	<i>Selective biotope mapping in Germany started some 30 years ago and is carried out by public authorities in all German states. It covers protected biotopes and those worthy of protection. The results are considered in the forest management planning.</i> PEFC D 1001 indicator 26 Areas that fulfil specific and recognised protective functions for society should be registered and mapped, and forest

Question	YES / NO*	Reference to scheme documentation	
<p>representative forest ecosystems such as riparian areas and wetland biotopes;</p> <p>b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;</p> <p>c) endangered or protected genetic <i>in situ</i> resources;</p> <p>and taking into account</p> <p>d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.</p>		Ch. 4.6, 5.2	<p>management plans or their equivalents should take full account of these areas</p> <p>Ch. 4.9 of PEFC D 1002-1 and Ch. 4.6 of 1002-2 requires that “forest management takes special care of protected biotopes or areas as well as of endangered tree and plant species”.</p> <p>PEFC D 1002-1, 1002-2 5.2 Water bodies in forests shall not be impaired by forest management. Special care shall be given to riparian zones...</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>	YES	<p>PEFC D 1001, Annex 1, indicator 25</p> <p>PEFC D 1002-1, Ch. 4.9;</p> <p>PEFC D 1002-2, Ch. 4.6</p>	<p>Indicator 25 of PEFC D 1001 refers to existence of endangered species.</p> <p>Ch. 4.8 of PEFC D 1002-1 and Ch. 4.6 of 1002-2 requires that “forest management takes special care of protected biotopes or areas as well as of endangered tree and plant species”.</p> <p><i>In Germany no protected / endangered plant or animal species is being exploited for commercial purposes, see Ch. 44 Bundesnaturschutzgesetz (Federal Nature Protection law³).</i></p>
<p>5.4.4 Forest management shall ensure successful regeneration through natural</p>	YES	PEFC D 1001, Annex 1, indicator 20 (PEOLG)	Indicator 20 of PEFC D 1001 Natural regeneration should be preferred

³ http://www.gesetze-im-internet.de/bundesrecht/bnatschg_2009/gesamt.pdf

Question	YES / NO*	Reference to scheme documentation	
regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.		4.2 a) PEFC D 1002-1, Ch. 1.2, 4.3, 4.4, 4.6, 4.7 and 4.8; PEFC D 1002-2, Ch. 4.2 ,4.3, 4.4	PEFC D 1002-1, 4.7 Natural regeneration shall be preferred where the expected regeneration is site adapted and satisfactory with respect to quality and quantity and where planting is not necessary for the conversion into a site adapted stocking. PEFC D 1002-2 4.2 The provenance recommendations for forest seed and plant material shall be followed. 4.3 Seed and plant material with verifiable origin shall be used, as far as it is available on the market for a specific provenance. 4.4 Genetically modified organisms are not used.
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.	YES	PEFC D 1002-1, Ch. 4.2, 4.3 and 4.4; PEFC D 1001, Annex 1, indicator 9 and 19 PEFC D 1002-2, Ch. 4.2 and 4.3	For reforestation and afforestation Ch. 4.3 of PEFC D 1002-1 and 4.2 of PEFC D 1002-1 refers to provenance recommendations, and require the usage of seed and plant material with verifiable origin and a special procedure for verification of the origin approved by PEFC Germany (Ch. 4.4 of PEFC D 1002-1 and Ch. 4.3 of PEFC D 1002-2). Indicator 9 of PEFC D 1001 refers to gene conservation forests and acknowledged seed-producing stands and Indicator 19 to tree species composition and types of forest stands.
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	PEFC D 1001 indicators 19, 20, PEFC D 1002-1, Ch. 5.2, 4.8	<i>Forest owners participating in PEFC are obliged to conform to national and regional legislation.</i> PEFC D 1001 indicators 19 (types of stands) and 20 (natural regeneration) Ch. 4.8 of PEFC 1002-1 set restrictions on clear cutting. <i>In Germany riparian zones are the most important elements of ecological</i>

Question	YES / NO*	Reference to scheme documentation	
			<p><i>connectivity (bio-corridors), PEFC D 1002-1, Ch. 5.2 (“Special care shall be given to riparian zones ...”).</i></p> <p><i>Silvicultural requirement on regeneration, preference on continuous forest cover, etc., contribute to the improvement of ecological connectivity on landscape level.</i></p> <p><i>Besides, the target of nature protection legislation in Germany, including Natura 2000 as EU legislation, is to ensure ecological connectivity by a dense net of protected areas.</i></p>
5.4.7 Genetically-modified trees shall not be used.	YES	PEFC D 1002-1, Ch. 4.5; PEFC D 1002-2, Ch. 4.4	The use of genetically-modified trees are forbidden according to Ch. 4.5 of PEFC D 1002-1 and Ch. 4.4 of PEFC D 1002-2.
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.	YES	PEFC D 1001, Annex 1, indicator 19 (PEOLG 4.2. a, 4.2.b) PEFC D 1002-1, Ch. 4.1; PEFC D 1002-2, Ch. 4.1, 4.5 and 6.10	<p>Indicator 19 of PEFC D 1001.</p> <p>4.2. a For reforestation and afforestation, origins of native species and local provenances that are well adapted to site conditions should be preferred, where appropriate. Only those introduced species, provenances or varieties should be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.</p> <p>4.2. b Forest management practices should, 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 should also aim to maintain and restore landscape diversity.</p>

Question	YES / NO*	Reference to scheme documentation	
			<p><i>Copy of PEFC requirement</i></p> <p>Ch. 4.1 of PEFC D 1002-1 and 1002-2 require maintenance of natural and mixed stands and</p> <p>Succession areas are promoted in Ch. 4.5 and 6.10 of PEFC D 1002-2.</p>
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	YES	PEFC D 1002-1, Ch. 4.8	4.8 Clear cuttings shall be omitted on principle....Small scale utilisations, which serve the development of a natural regeneration or the conversion into an improved vertical structure or the maintenance of historic silvicultural methods (coppice systems), are not regarded as clear cuttings
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.	YES	PEFC D 1002-1, Ch. 2.5 to 2.7; 1.2PEFC D 1002-2, Ch. 2.4 to 2.7	<p>Advised use of machinery, felling and skidding damages are described in Ch. 2.5-2.7 of PEFC D 1002-1 and PEFC D 1002-2.</p> <p>1.2 A permanent forest cover shall be maintained. In cases of openings, i.e. a reduction of stock density beyond a critical level (0.4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy.</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.	YES	<p>PEFC D 1001, Annex 1, indicator 7</p> <p>PEFC D 1002-1, Ch.3.5, 2.5 - 2.6</p> <p>PEFC D 1002-2, Ch.?</p>	<p>PEFC D 1002-1 Ch. 3.5 The accessibility of the forests adapted to the demand is necessary. Herewith special care should be put on the environmental interests. Notably biotopes with high conservation value shall be treated with care, and Ch. 2.5 Extensive passing-over with machinery is to be avoided, Ch. 2.6 The permanent operability of the skid track as bearing of vehicles shall be ensured, Ch. 2.7 avoidance of skidding damage.</p> <p>In protected areas infrastructure development has to be permitted by the authorities according to the nature protection law.</p> <p>Indicator 7 of PEFC D 1001 refers to density, construction and maintenance of</p>

Question	YES / NO*	Reference to scheme documentation	
			forest roads.
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.	YES	PEFC D 1001, Annex 1, indicator 22 PEFC D 1002-1, Ch. 4.11; PEFC D 1002-2, Ch. 4.8	Indicator 22 of PEFC D 1001 refers to documentation of browsing and bark peeling damage Ch. 4.11 of PEFC D 1002-1 and 4.8 of PEFC D 1002-2 state that “adapted game stocks are the precondition for naturally sound forest management within the interest of biological diversity. Within his opportunities the forest owner works towards adapted game stocks”. See Guidance 6.
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.	YES	PEFC D 1001, Annex 1, indicator 24 (PEOLG 4.2 h) PEFC D 1002-1, Ch. 4.10; Guidance 5. PEFC D 1002-2, Ch. 4.7	Indicator 24 of PEFC D 1001 Standing and fallen dead wood, hollow trees, old groves and special rare tree species should be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on health and stability of forests and on surrounding ecosystems. Ch. 4.10 of PEFC D 1002-1 and 4.7 of PEFC D 1002-2 require conservation of “an appropriate proportion of biotope wood, i.e. dead wood, snag and cave trees”. Guidance 5.
Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management			
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.	YES	PEFC D 1001, Annex 1, indicator 26 (PEOLG 5.1 a and 5.1 b) PEFC D 1002-1, Ch. 4.8, 4.9, 5.1 to 5.5; PEFC D 1002-2,	Indicator 26 of PEFC D 1001 PEOLG 5.1a <i>is a copy of the PEFC requirement.</i> PEOLG 5.1 b Areas that fulfil specific and recognised protective functions for society should be registered and mapped, and forest management plans or their equivalents should take full account of these areas. Ch. 5.1 of PEFC D 1002-1 and 1002-2 requires taking into account all

Question	YES / NO*	Reference to scheme documentation	
		Ch. 4.6, 5.1 to 5.5	protective functions. Protection of water resources and soils are described in Ch. 5.2-5.5 of the same documents.
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.	YES	PEFC D 1002-1, Ch. 4.8, 4.9, 5.1 to 5.5; PEFC D 1001, Annex 1, indicator 26 (PEOLG 5.1 b) PEFC D 1002-2, Ch. 4.6, 5.1 to 5.5	Ch. 5.1 of PEFC D 1002-1 and 1002-2 requires taking into account all protective functions. <i>The mapping of forest functions (Waldfunktionenkartierung) and the mapping of forest biotopes (Waldbiotopkartierung) are legally binding according to the forest laws of the Bundesländer.</i> <i>PEFC D 1001 Indicator 26 (PEOLG 5.1 b) is a copy of PEFC requirement.</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	PEFC D 1001, Annex 1, indicator 15 and 22 (include PEOLG 4.2.g, 5.2.a) PEFC D 1002-1, Ch. 2.5 to 2.7, 4.11; PEFC D 1002-2, Ch. 2.4 to 2.7, 4.8	Ch. 2.5 of PEFC D 1002-1 and 1002-2 requires a larger distance between skid tracks on soils sensitive to compression. In addition, Ch. 2.5-2.7 describe appropriate skid tracks and regulate felling and skidding damages. Game stocks are in the scope of Ch. 4.11 of PEFC D 1002-1 and 4.8 of PEFC D 1002-2. Guidance 6. <i>Because skidding is the most important problem on sensitive soils the German PEFC scheme has a number of detailed requirements on this issue (PEFC D 1002-1, Ch. 2.5 – 2.6). Clear cutting is allowed only in special occasions, resulting the forests have a closed canopy that decrease the risk for soil erosion.</i> <i>PEOLG 5.2 is a copy of PEFC requirement 5.5.1.</i>
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	YES	PEFC D 1002-1, Ch. 2.1, 2.3, 5.2, 5.3 and 5.5; PEFC D 1002-2,	PEFC D 1002-1, 1002-2: 2.1 Methods of integrated plant protection shall be used; 2.2 Application of plant protective agents is only used as last option ... The application of plant protective is carried out in any case by a person competent to do so according

Question	YES / NO*	Reference to scheme documentation	
<p>resources.</p> <p>Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.</p>		<p>Ch. 2.1, 2.3, 5.2, 5.3 and 5.5</p>	<p>to the law on plant protection; PEFC D requires in addition that a person shall have a forest degree from university or technical college.</p> <p>2.3 Liming for soil protection shall only be carried out on the basis of the results of a soil or forest nutrition expertise or when sound site surveys have been carried out and documented.</p> <p>Ch. 5.2 of PEFC D 1002-1 and 1002-2 states that “water bodies in forests shall not be impaired by forest management. Special care shall be given to riparian zones and the quality of ground and surface water in water protection areas”.</p> <p><i>Inappropriate use with respect to water courses is defined by law, esp. for every licensed pesticide.</i></p> <p><i>In addition,</i></p> <p>Ch. 5.3 of PEFC D 1002-1 and 1002-2 forbid installation of new draining facilitates and</p> <p>Ch. 5.5 of PEFC D 1002-1 and 1002-2 require the use of bio-degradable chain oils and hydraulic liquids for protecting water bodies.</p>
<p>5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>	<p>YES</p>	<p>PEFC D 1002-1, Ch.3.5</p> <p>PEFC D 1001, Annex 1, indicator 7</p>	<p><i>The construction of roads/bridges in protected areas needs a permit. Depending on the size of the road/bridge an Environmental Impact Assessment might be necessary.</i></p> <p>Ch. 3.5 of PEFC D 1002-1... Herewith special care should be put on the environmental interests. Notably biotopes with high conservation value shall be treated with care....</p> <p>PEFC D 1001, Annex 1, indicator 7 on density, construction and maintenance of forest roads</p>

Question	YES / NO*	Reference to scheme documentation	
Criterion 6: Maintenance of other socio-economic functions and conditions			
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	PEFC D 1001, Annex 1, indicator 8 (PEOLG 6.1) PEFC D 1002-1, Ch. 1.1 Guidance 1 PEFC D 1002-3 Recreational standard PEFC D 1002-2, Ch. 6.1 to 6.3	PEFC D 1002-1 1.1 Forest management plans shall be prepared. Guidance 1 Forest management plans shall include Definition of targets (including a definition of ecological, economic and social targets according to PEFC). Ch. 6 of PEFC D 1002-1 states that the forest owner “bears his responsibility for society and especially for the employees in his forest in its entirety”. PEFC D 1002-3 development of recreational strategy (stage 1) and its implementation (stage 2). <i>PEOLG 6.1 a is a copy of the PEFC requirement</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	PEFC D 1002-1 Ch. 6.10, 6.11	<i>According to PEFC Germany the the health and well-being of communities is guaranteed by the governmental social net and other policy instruments, no communities are directly dependent on forests. SFM is ensuring the quality and quantity of forest resources which has positive impact on local communities.</i> 6.10 The public has free access to the forests for recreation purposes. ... Forest management shall respect the recreational function and the aesthetic value of the forest. 6.11 Sites with acknowledged extraordinary historic, cultural or religious importance shall be managed with special care. <i>Regarding consideration of social impacts of forest management on local people, the regional and FMU level standards focus strongly on labour issues. FMU level standards requires, however, consideration of recreational values, that are of high importance in Germany.</i>

Question	YES / NO*	Reference to scheme documentation	
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	PEFC D 1002-1, Ch. 0.1 (Property right are defined through Federal and regional legislation); PEFC D 1002-2, Ch. 0.1	Property right are determined in the national and state legislation – a reference for which is provided in Ch. 0.1 of PEFC D 1002-1 and 1002-2. Ownership structure is the key indicator in Annex 1 of PEFC D 1001 (Indicator 1).
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.	n.a.		There are no indigenous people living in Germany.
5.6.5 Adequate public access to forests for the purpose of recreation shall be provided	YES	PEFC D 1001, Annex 1, indicator 26	Ch. 6.10 of PEFC D 1002-1 states that “the public has free access to the forests for recreation purposes. Limitations are permissible especially for the

Question	YES / NO*	Reference to scheme documentation	
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.		PEFC D 1002-1, Ch. 6.10; PEFC D 1002-3 1.2	protection of the ecosystem and for the reasons of forest and game management, for the protection of forest visitors, to avoid considerable damages or safeguarding important interests of the forest owner". PEFC D 1002-3 1.2 The strategy incorporates at least - Infrastructure planning (benches, sport facilities, picnic areas etc.), - Concept of conflict management and tools for conflict resolution (consideration of social, ecological and economic interests), e.g. guidelines for routing... <i>All forests in Germany are open to public.</i>
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.	YES	PEFC D 1002-1, Ch. 6.11; PEFC D 1001, Annex 1, indicator 11 PEFC D 1002-2, Ch. 6.11	Ch. 6.11 of PEFC D 1002-1 and 1002-2 require special management for "sites with acknowledged extraordinary historic, cultural or religious importance". Indicator 11 of PEFC D 1001 examines the number of sites within forest land designated as having cultural or spiritual values. <i>Forest owners are responsible to survey and identify the valuable sites on their properties.</i>
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.	YES	PEFC D 1002-1, Ch. 1, 3.1, introduction Ch. 3 and 6; PEFC D 1001, Annex 1, indicator 27 PEFC D 1002-2, Ch. 1, 3.1, introduction Ch. 3 and 6 PEFC D 1002-3	Ch. 1 of PEFC D 1002-1 requires maintenance of varied forest functions, while Introductions to Ch. 3 and 6 of PEFC D 1002-1 mention the importance of maintenance of the productive and socio-economic functions. Indicator 27 of PEFC D 1001 examines the "total expenditures for long-term sustainable services from forests", incl. Protection and Sanitation, Recreation and Environmental Education. PEFC DE 1002-3 set specific additional requirements for management of recreational forests.
5.6.8 Forest managers, contractors,	YES	PEFC D 1002-1, Ch.	Requirements for appropriate qualifications are included into Ch. 6.1 -6.3 of

Question	YES / NO*	Reference to scheme documentation	
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.		6.1 to 6.3; 6.4 PEFC D 1001, Annex 1, indicator 31 (PEOLG 6.1 e) PEFC D 1002-2, Ch. 6.1 to 6.3	PEFC D 1002-1 and 1002-2, but no direct mentioning of encouragement to keep up-to-date through continuous training. an access to training as well as to advanced and further education is determined in Ch. 6.7 of PEFC D 1002-1 and 1002-2 The number and structure of training and further education measures is one of the key indicators of PEFC D 1001 (Annex 1 Indicator 31). Forest managers, contractors, employees and forest owners should be provided with sufficient information and encouraged to keep up to date through continuous training in relation to sustainable forest management Ch. 6.4 of PEFC D 1002-1 requires that contractors eligible to operate in PEFC certified forests shall be certified by PEFC Germany against contractor certification standard.
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.	YES	PEFC D 1002-1, Ch. 6.1; PEFC D 1001, Ch. 7.1.1.5 PEFC D 1002-2, Ch. 6.1	In Germany forest owners supported by professional foresters are the source of knowledge rather than local communities or local people. 6.1 In case that own staff is employed, a number of staff specialised in forestry, which is appropriate to the operational situation of the forest enterprise, shall be maintained or added. Workers will be considered as specialised staff if they have finished the respective training for the job or have work experience of several years. PEFC D 1001 ch 7.1.1.5 also requires communication and consultation with stakeholders and local communities.
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	YES	PEFC D 1001, Ch. 7.1.1.5 PEFC 1002-3 Recreation Ch. 1.2	Ch. 7.1.1.5 of PEFC D 1001 The regional working group shall ensure effective communication and consultation with stakeholders and local communities concerning: a) state of the forests, typical forest management practices within the region

Question	YES / NO*	Reference to scheme documentation	
for resolving complaints and disputes relating to forest management between forest operators and local people.			<p>and their effect on sustainable forest management;</p> <p>b) the objectives and the action programme;</p> <p>c) requirements for sustainable forest management defined in PEFC D 1002-1;</p> <p>PEFC 1002-3 Ch. 1.2 The strategy incorporates at least the following:</p> <p>Provision of information to the public, e.g. regular PR relating to sustainable forest management, respective events.</p> <p>a) Forest-related education, e.g. educational projects offered by certified external or internal trainers (guided tours ...) or educational facilities (forest nature trail ...).</p> <p>d) Concept of conflict management and tools for conflict resolution (consideration of social, ecological and economic interests), e.g. guidelines for routing and application of markers and sign posts, public relations, organisation and dialogue</p> <p><i>Stakeholder communication is required at regional level and in recreational forest management.</i></p>
5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	YES	<p>PEFC D 1001, Annex 1, indicator 30 and 31 (PEOLG 6.2 b, 6.1 e)</p> <p>PEFC D 1002-1, Ch. 6.5 to 6.7; PEFC D 1002-2, Ch. 6.5 to 6.7</p>	<p>Ch. 6.5 of PEFC D 1002-1 and 1002-2. Health and safety regulations of the responsible insurance carrier and regulations for occupational safety shall be observed. If technically possible, an efficient chain of survival shall be established</p> <p>Ch. 6.7 All employees in forestry shall have access to an <u>appropriate</u> training as well as to further education. Such measures shall be documented.</p> <p>The frequency of occupational accidents and occupational diseases in forestry in addition to the number and structure of training and further education measures belong to key indicators of PEFC D 1001 (Annex 1 Indicator 30 and 31).</p>

Question	YES / NO*	Reference to scheme documentation	
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.	YES	PEFC D 1002-1, Ch. 6.5; PEFC D 1001, Annex 1, indicator 30 PEFC D 1002-2, Ch. 6.5	Ch. 6.5 of PEFC D 1002-1 and 1002-2. Health and safety regulations of the responsible insurance carrier and regulations for occupational safety shall be observed. The frequency of occupational accidents and occupational diseases in forestry is one of the key indicators in PEFC D 1001 (Annex 1 Indicator 30).
5.6.13 Forest management shall comply with fundamental ILO conventions.	YES	PEFC D 1002-1, Ch. 0.1 PEFC D 1002-2, Ch. 0.1	Ch. 0.1 of PEFC D 1002-1 and 1002-2 refer to international conventions, including Core ILO conventions [International Labour Organisation]. <i>Most of the core ILO Conventions are ratified by Germany. This means that the content of those conventions is translated into the national legislation. Germany has not ratified the Convention on Indigenous and Tribal People (C169), as there are no indigenous people in Germany, nor the Convention on Occupational Safety and Health (C155). National acts (e.g. Maternity Protection Act, Ordinance on Maternity Protection at the Workplace, Young Workers Protection Act, Working Time Act, Act on the Payment of Child Raising Benefit and Child Raising Leave, Insolvency Ordinance) stipulate requirements comparable to those in the two conventions.</i> <i>The standard formulation on compliance with ILO conventions is not informative to forest owners or other parties applying the standard.</i>
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	YES		Ch. 4 of PEFC D 1002-1 states that “forest management shall take into account scientific knowledge”. <i>There are 4 forestry universities, 5 universities for applied science and 10 regional research centres (run by the state forest administration) in Germany. All have a long tradition, close network of research plots and the assignment to provide advice to forest owners.</i>

Question	YES / NO*	Reference to scheme documentation	
out by other organisations, as appropriate.			
Criterion 7: Legal Compliance			
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.	YES	PEFC 1001 Ch. 7.1.2.1.1 PEFC D 1002-1, Ch. 0.1 PEFC D 1002-2, Ch. 0.1	Ch. 0.1 of PEFC D 1002-1 and 1002-2 refer to international conventions and relevant national and state legislation. <i>Forest legislation in Germany is mainly state (regional) specific, i.e. information on legislation differs between regions. This fact is taken into account by the German PEFC scheme: PEFC D 1001, Ch. 7.1.2.1.1 b) requires information and guidance to be provided to participants (on implementation of PEFC D 1002-1)</i> <i>Regional group entity has the responsibility to assure that participants are aware of applicable legislation.</i>
5.7.2 Forest management shall provide for adequate protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	PEFC D 1002-1, Ch. 0.1 PEFC D 1002-2, Ch. 0.1	Ch. 0.1 of PEFC D 1002-1 and 1002-2 refer to international conventions and relevant national and state legislation. <i>Germany has a strong law enforcement structure and capacity to efficiently control and enforce unauthorised and illegal activities by third parties (others than forest owners). The role of those authorities in law enforcement is exclusive.</i>

PART IV: Standard and System Requirement Checklist for Certification and Accreditation Procedures (Annex 6)

2 Checklist

Referred GFCS documents

Requirements for bodies providing audits for regional certification.	PEFC D 1003-1:2014
Requirements for bodies providing audits for Christmas tree plantations on forest land	PEFC D 1003-2:2014
Requirements for bodies providing audits for recreational forest	PEFC D 1003-3:2014
Standard revision procedures	PEFC D 4001:2013
PEFC Notification of certification bodies	PEFC D 4007:2014
Chain of Custody of Forest Based Products – Certification Body Requirements	PEFC D ST 2003:2012

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
Certification Bodies					
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that <u>cannot be involved in the standard setting process</u> as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	YES	PEFC D 1003-1:2014 (see Introduction, para. 2) PEFC D 4001:2013 sec	<i>PEFC D 1003-1 Certifications are conducted as accredited certifications that require impartiality and independence</i> <i>PEFC D 4001- states that PEFC Germany is the governing body of standard setting. List of invited stakeholders do not include certification bodies, therefore the system do not allow their strong participation in the standard setting process.</i>

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
				2.1, 2.3	
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	YES	PEFC D 1003-1:2014 PEFC D 4007:2014 Notification 4.2.1	PEFC D 1003 requires compliance with ISO 17021 standard on relevant aspects PEFC D 4007:2014 on notification sec 4.2.1 require that accreditation for forest management certification shall be issued against ISO 17021:2011
3.	Does the scheme documentation require that certification body chain of custody certification against Annex 4 shall fulfil requirements defined in ISO Guide 65?	Annex 6, 3.1	YES	PEFC D 4007:2014 Notification sec 4.2.2	PEFC D 4007:2014 sec 4.2.2. ... <i>Notified certification body...</i> shall have valid accreditation issued by an accreditation body that is a signatory of the Multilateral Recognition Arrangement (MLA) for product certification ... (of any regional accreditation cooperation entity) ... The accreditation shall be issued against ISO/IEC 17065 and the scope of the accreditation shall explicitly include PEFC D ST 2002:2013.
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	YES	PEFC D 1003-1:2014, Ch. 7	The scheme documentation requires that certification bodies carrying out forest certification shall have “appropriate knowledge and competencies concerning the German PEFC scheme” and specifies exact areas of knowledge in Ch. 7.2-7.4 of PEFC D 1003-1:2014.

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
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	YES	PEFC D ST 2003:2012, Ch. 6	<p><i>The German PEFC Scheme has adopted the international PEFC chain of custody standard and will apply the respective PEFC standard PEFC 2003:2012 for the competence requirements for auditors.</i></p> <p><i>The PEFC ST 2003:2012 refers to respective ISO standards (ISO 17021 and ISO 17065) in the description of auditors' competent requirements.</i></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 <u>C-o-C</u> certifications?	Annex 6, 3.1	YES	PEFC D 1003-1:2014, Ch. 7; PEFC D ST 2003:2012, Ch. 6	Ch. 7.2-7.4 of PEFC D 1003-1:2014 precisely state that a certification body carrying out FM certification shall possess knowledge of the German PEFC scheme.
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	YES	PEFC D 1003-1:2014, Ch. 7.4;	<p>Ch. 7.4 of PEFC D 1003-1:2014 specifies in detail the knowledge and competences the auditor should possess, including technical know-how of the certification process and issues related to forest management.</p> <p><i>For chain of custody certification the competence requirements are defined in the PEFC ST 2003:2012 standard.</i></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	Annex 6, 3.2	YES	PEFC D 1003-1:2014, Ch. 7.4.3 a);	Ch. 7.4.3 of PEFC D 1003-1:2014 require the auditor to know the "principles, procedures and methods of auditing according to ISO 19011 enabling the auditor to make appropriate use of them and to ensure that the audits are

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
	Environmental Management Systems auditors?				conducted in a consistent and systematic way”.
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	YES	PEFC D 1003-1:2014, Ch. 7.4.4;	Additional competences of auditors carrying out forest management audits are listed in Ch. 7.4.4 of PEFC D 1003-1:2014.
Certification procedures					
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	YES	PEFC D 1003-1:2014, Ch. 9.1;	<p>PEFC D 1003-1 1 Scope: This document provides requirements, additional to ISO/IEC 17021</p> <p>8.1 (9.1) All requirements of clause 8.1 (9.1) ISO/IEC 17021:2011 apply.</p> <p>ISO 17021 8.1. Certification body shall ... make publicly available ... information describing its audit and certification procedures, 9.1.1.1 <i>requires procedures for auditing</i></p> <p>Ch.9.1 of PEFC D 1003-1:2014 requires that the certification body should possess “documented procedures for determining audit time”</p> <p><i>The documented procedures, documented processes, management system manual and the control of documents are sufficiently covered by ISO 17021.</i></p>

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
11.	Does the scheme documentation require that applied certification procedures for forest management certification (or chain of custody certification against a scheme specific chain of custody standard) shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 4	YES	PEFC D 1003-1:2014, 9.1.1	All the requirements given in clause 9.1 of ISO 17021 apply. <i>For all aspects of certification process the scheme requires compliance with ISO 17021</i>
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	YES	PEFC Germany has fully adopted PEFC ST 2003:2012	
13.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	YES	PEFC D 1003-1:2014, 7.4.3 (see Introduction, para. 5)	PEFC D 1003-1, 7.4.3 Principles, procedures and methods of auditing according to ISO 19011 enabling the auditor to make appropriate use of them and to ensure that the audits are conducted in a consistent and systematic way.
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	Annex 6, 4	YES	PEFC D 1003-1, Anlage 2 -> PEFC D 4007:2014, Ch. 5	Ch. 5 of PEFC D 4007:2014 states that the certification body has to “provide PEFC Germany, without delay, with information on every forest management and/or chain of custody certificate which is covered by the notification and /or information on any changes to already issued

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
	certificates?				certificates”.
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	YES	PEFC ST 2003:2012 Ch. 7.4 PEFC D 1003-1, Ch. 9.2.3.2.2 a) For CoC certification PEFC Germany has fully adopted PEFC ST 2003:2012	PEFC ST 2003:2012 7.4. The scope of the chain of custody audit is d) to determine the conformity of the client organisation with the PEFC logo usage rules and its effective implementation; and <i>and</i> <i>The control of the usage of the PEFC logo is carried out by the certification body based on ISO 17021, Ch. 8.4 (reference to certification and use of marks).</i> PEFC D 1003-1 does not explicitly state that certification body shall carry out controls of PEFC logo usage but refers to Ch. 6.3.7 of PEFC D 1001 which regulates the use of PEFC logo.
16.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	YES	PEFC D 1003-1, Ch. 9.3.1; PEFC ST 2003, Ch. 13.1.1	Ch. 9.3.1 of PEFC D 1003-1 states that “All the requirements given in clause 9.3 of ISO/IEC 17021:2011 apply”. <i>Note ISO17021 sec 9.3.2.2 states that surveillance audits shall be conducted at least once a year.</i>
17	Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?	Annex 6, 4	YES	PEFC D 1003-1, Ch. 9.1	Ch. 9.1.1 of PEFC D 1003-1 states that “All the requirements given in clause 9.1 of ISO/IEC 17021:2011 apply” <i>ISO 17021, Ch. 9.1.1.2 requires recertification audit every</i>

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					<i>third year and annual surveillance audits.</i>
18	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	PEFC D 1003-1, Ch. 8.3 and 8.4	Ch. 8.3 of PEFC D 1003-1 points out that the certification body is obliged to “make publicly available a summary of the surveillance audit report” and describes its content in the following Ch. 8.4
19	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	PEFC D 1003-1, Ch. 9.2.3.1.2	Ch. 9.2.3.1.2 of PEFC D 1003-1 states that “the certification body shall consider any relevant information from external bodies, such as governmental bodies, NGOs, etc. that it has received and shall use it as audit evidence to determine the client organisation conformity with the certification requirements.”
20.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	YES	e.g. PEFC D 1003-1, Ch. 9.2.3.1 and 9.2.3.2	According to PEFC D 1003-1 initial certification audit is divided into 2 stages – stage 1 and 2.
Accreditation procedures					
21.	Does the scheme documentation require that certification bodies carrying out forest management and/or chain of custody certification shall be accredited by a national accreditation body?	Annex 6, 5	YES	PEFC D 1003-1, Annex 1 PEFC D 4007:2014 notification 4.2.1, 4.2.2	PEFC D 4007 4.2.1 <i>for forest management certification body shall have ...valid accreditation, issued by the German accreditation body (DAkkS)</i> 4.2.2 shall have valid accreditation issued by an accreditation body that is a signatory of the Multilateral Recognition Arrangement (MLA) for product certification of IAF or IAF’s Regional Accreditation Groups... The

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
					accreditation shall be issued against ISO/IEC 17065 and the scope of the accreditation shall explicitly include PEFC D ST 2002:2013.
22.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES	PEFC D 1003-1, Ch. 9.2.5.2 e)	Section 9.2.5.2 of PEFC D 1003-1 states that “The certification body issues to the regional working group a certification document that shall include at least...e) Accreditation mark as prescribed by the accreditation body (including accreditation number where applicable)”.
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	YES	PEFC D 4007:2014 notification 4.2.1	See explanation on question 21.
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	Annex 6, 5	YES	PEFC D 4007:2014 notification 4.1.1 PEFC D 1003-1, Ch. 5	The notified certification body shall: a) Carry out the forest management certification and/or chain of custody certification within the scope of the valid accreditation.

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	
	the accreditation scope?				
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	YES	PEFC D 4007:2014 notification 4.2.2	See explanation on question 21.
26.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES	PEFC D 1003-1, Annex 2; PEFC D 4007:2014	<i>Notification procedures and contracts are comprehensive and consistent</i>
27.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES	PEFC D 1003-1, Annex 2; PEFC D 4007	Forest management certification is restricted to the certification bodies accredited by German national accreditation body. Any certification body meeting the PEFC requirements is eligible for notification in chain of custody certification

Part V: Standard and System Requirement Checklist for system specific Chain of custody standards – COMPLIANCE WITH PEFC ST PEFC 2002:2010

PEFC Germany has adopted the international PEFC ST 2003:2012 as the standard for chain of custody verification. Therefore, the checklist requirements of part V do not apply to the scheme.

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

2 Checklist

Referred GFCS documents:

PEFC Notification of certification bodies	PEFC D 4007:2014
Issuance of licenses for PEFC logo usage and for [PEFC D] label usage	PEFC D 4006:2014
Dispute settlement procedures for regional PEFC working groups.	PEFC D 3003:2014

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	
PEFC Notification of certification bodies					
1.	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> ? Quote: PEFC GD 1004:2009 PEFC notification of certification bodies	Chapter 5	YES	PEFC D 4007:2014 Terms for notification and contract conditions for certification bodies undertaking a) forest management or b) chain	<i>PEFC D 4007 sets out the written procedures</i> - <i>the accreditation requirements in notification are fully aligned with PEFC requirements.</i> - <i>in forest certification the operational scope is the Germany where the relevant standards are applicable.</i> - <i>in CoC certification the scope is international</i>

N o.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	
	<p>5.1 The notifying body shall have <u>written procedures</u> for the PEFC notification which ensure that :a) the PEFC notified certification body is meeting the PEFC Council's and PEFC endorsed scheme's requirements for certification bodies, b) 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 ,c) the PEFC notification may be <u>terminated</u> 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 authorised body, d) the PEFC notification is based on a <u>written contract</u> between the notifying body and the PEFC notified certification body ,e) the PEFC notified certification body provides the notifying body with information on <u>certified entities</u> as required by the PEFC Registration System ,f) the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc.</p> <p>5.2 The notifying body may charge a fee for the</p>			of custody certification	<p>and based on any internationally recognized accreditation</p> <ul style="list-style-type: none"> - the written contracts define the conditions for contract termination - Certification bodies are obliged to inform on any certification and changes in certification scopes. - The terms are non-discriminatory - Notification fees are paid by each issued certificate <p><i>In the German PEFC scheme, the fee is decided by the German Forest Certification Council</i></p>

N o.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	
	<p><i>PEFC notification.</i> <i>The authorised body shall inform the PEFC Council about the level of its PEFC notification fees, when requested.</i></p>				
PEFC Logo usage licensing					
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"> - The PEFC Logo usage licence shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008. - ...may issue a PEFC Logo usage multi-licence to a holder of a multi-site chain of custody certificate... - The licensing body shall have written procedures for the PEFC Logo licensing... - The licensing body shall have a mechanism for the investigation and enforcement of the compliance with PEFC Logo usage rules (PEFC ST 2001:2008)... 	Chapter 6	NO	<p>PEFC D 4006:2014</p> <p>PEFC D 2001; PEFC ST 2001:2008 v2</p>	<p>PEFC D 4006:2014 are the written procedures</p> <p><i>PEFC D 4006 is a procedural document that is based on PEFC ST 2001 and PEFC Council Guideline 1005:2012.. which ensures compliance of logo users with PEFC D ST 2001. The PEFC D ST 2001 on logo use is identical to PEFC ST 2001.</i></p> <p><i>The PEFC logo licensing procedures are aligned with PEFC requirements. However, the GFCS issues the logo licenses also against certifications of Christmas tree plantations and recreational forests which is not in line with the recommended scope of the endorsement (see report section 3.1).</i></p> <p><i>If the two types of certifications will not be covered by the PEFC endorsement, the logo licensing rules shall be revised accordingly.</i></p> <p><i>A major non-conformity requiring further clarification.</i></p>

N o.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	
Complaints and dispute procedures					
3.	<p>Are complaint and dispute procedures for usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i>?</p> <p>Quote: <i>1 The PEFC Council and the authorised bodies shall have <u>written procedures</u> 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: a) <u>acknowledgement</u> of the complaint to the complainant, b) <u>gathering and verification</u> of all necessary <u>information</u>, validation and <u>impartial evaluation</u> of the complaint, and decision making on the complaint, c) <u>formal communication</u> of the <u>decision</u> on the complaint and the complaint handling process to the complainant and concerned parties</i></p>		YES	<p>PEFC D 4005:2014</p> <p>PEFC D 3003:2014</p>	<p>Complaint and dispute procedures are reflected in a separate document - PEFC D 4005:2014 “Dispute settlement procedures”: an independent Task Force Group (TFG) plays a decisive role in the dispute settlement process, see PEFC D 4005, Ch. 5.1 and 5.2“</p> <p>PEFC D 3003:2014 defines activities of the regional working group or implementation of sustainable forest management by participants in the regional certification</p> <p><i>PEFC Germany acknowledges a complaint and decides if it is valid for further investigation. Independent task force studies the complaint and proposes a solution but PEFC Germany Board or General Assembly decide on the outcome. PEFC Germany informs on the decision to the complainant.</i></p>



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Appendix 2

List of Stakeholders in Standard Setting Working Group



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Table 1 Working Group “Standards”

Stakeholder organisation (representatives)	Category
Sachsenforst	State forests
Sozialversicherung für Landwirtschaft, Forsten und Gartenbau	Trade unions
IG Bauen-Agrar-Umwelt (Sachsen)	Trade unions
Landesforst Brandenburg	State forests
Sächsischer Waldbesitzerverband	Private forests
Bundesvereinigung des Holztransport Gewerbes	Other repr. of forestry
Bayerische Staatsforsten	State forests
LWK-Niedersachsen	Other repr. of forestry
Fraunhofer Institut (IFF)	Science
Gräflich Erbach-Fürstenaussche Verwaltung	Private forests
Bayerischer Waldbesitzerverband	Communal forests
Sachsenforst	State forests
Hohenzollern-Forstbetrieb	Private forests
Waldbauernverband NRW	Private forests
Landesbetrieb Wald und Holz NRW	State forests
SDW Rheinland-Pfalz	ENGOS
Netzwerk Holzenergie Forst/KWF	Other repr. of forestry
Waldbesitzerverband Thüringen	Private forests
Frauen im Forstbereich	Other repr. of forestry
Waldbesitzerverband Rheinland-Pfalz	Private forests
AfL Sachsen-Anhalt	Forest service enterprises
Waldeckische Domänialverwaltung	Communal forests
LWK-Niedersachsen	Other repr. of forestry
Bund Deutscher Forstleute	Trade unions
Waldbesitzerverband Niedersachsen	Communal forests
Waldbesitzerverband Niedersachsen	Communal forests
MLR Baden- Württemberg	State forests
Arbeitsgemeinschaft der Grundbesitzerverbände	Private forests
IG Bauen-Agrar-Umwelt	Trade unions
HNE Eberswalde	Science
Waldbauernverband NRW	Private forests
Arbeitsgemeinschaft Rohholzverbraucher	Timber industry
Deutscher Bauernverband	Private forests
Landesforstbetrieb Sachsen-Anhalt	State forests
Interessengemeinschaft Zugpferde	Forest service enterprises
Niedersächsische Landesforsten	State forests



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Stakeholder organisation (representatives)	Category
NW-FVA Göttingen	Science
Schutzgemeinschaft Deutscher Wald	ENGOS
Interessengemeinschaft Zugpferde	Forest service enterprises
AfL Sachsen-Anhalt	Forest service enterprises
Bundesforst	State forests
Landesforst Brandenburg	State forests
FH Erfurt	Science
AGDW - Die Waldeigentümer	Communal forests
Thüringenforst	State forests
Hessisches Ministerium für Umwelt, Energie, Landwirtschaft und Verbraucherschutz	State forests
AfL Niedersachsen e.V.	Forest service enterprises
IG Bauen-Agrar-Umwelt (Sachsen-Anhalt)	Trade unions
Zertifizierungsring für überprüfbare Forstliche Herkunft	Other user groups
RAL Gütegemeinschaft Wald u. Landschaftspflege	Forest service enterprises
Deutscher Jagdverband	ENGOS
Deutscher Forstwirtschaftsrat	Other repr. of forestry



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Appendix 3

Summary of Stakeholder Replies



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1. Forest owner / manager	
Did you participate in the standard revision?	Sustainable forest management (SFM). Other standards – no.
Would you have been interested to participate?	No
By whom and when were you invited to participate to the revision of standard for PEFC Forest certification?	PEFC Germany via e-mail on 08/08/2013
What was your main interest to consider participation to standard revision?	PEFC costs our company a lot of time and thus also a lot of money. Therefore, my personal goal was that PEFC should maintain a minimum level of practicability and credibility.
In your view, have all interested parties relevant to standard revision been proactively identified and invited and given the possibility to participate and contribute to the standard revision?	Yes
Did the organiser provide you with adequate material before the process?	Yes
Did the stakeholders in the standard setting working groups represent the different interests in a balanced way?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Did the revision process follow the procedures that were communicated with participants in advance?	<i>Not answered</i>
Were you aware of any substantive or procedural complaints by any stakeholder on standard revision?	Sustainable forest management (SFM) – no. Other standards – I do not know.
Are you aware of any dispute settlement procedures in case of conflicting views in standard revision?	Sustainable forest management (SFM) – no. Other standards – I do not know.
Do you believe any aspects of the standard or its revision process deserve further consideration?	Sustainable forest management (SFM) – no. Other standards – I do not know.
Have you been given a meaningful opportunity to contribute to standard formulation and to submit comments for further consideration?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Did any participant in the Standard Setting Working Groups considered in an open and transparent way submit the views and comments?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Have all comments received in public consultations been discussed and addressed in an objective and transparent way?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Were the criteria (requirements) in the standard agreed on in consensus?	Sustainable forest management (SFM) – yes. Other standards – I do not know.



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2. Administration / authority / forest owner / research institute	
Did you participate in the standard revision?	Sustainable forest management (SFM) – yes. Other standards – no.
Would you have been interested to participate?	Yes
By whom and when were you invited to participate to the revision of standard for PEFC Forest certification?	PEFC-Germany at the beginning of the revision process
What was your main interest to consider participation to standard revision?	Our organisation is affected because we are PEFC certified. The agreed standards lead to direct economic and ecological effects for our state forest organisation.
In your view, have all interested parties relevant to standard revision been proactively identified and invited and given the possibility to participate and contribute to the standard revision?	Yes
Did the organiser provide you with adequate material before the process?	Yes. Sometimes the provision with material came a little late for preparation.
Did the stakeholders in the standard setting working groups represent the different interests in a balanced way?	Yes in all standards.
Did the revision process follow the procedures that were communicated with participants in advance?	Yes in all standards
Were you aware of any substantive or procedural complaints by any stakeholder on standard revision?	No in all standards.
Are you aware of any dispute settlement procedures in case of conflicting views in standard revision?	Yes in all standards.
Do you believe any aspects of the standard or its revision process deserve further consideration?	No in all standards.
Have you been given a meaningful opportunity to contribute to standard formulation and to submit comments for further consideration?	Yes in all standards
Were the views and comments submitted by any participant in the Standard Setting Working Groups considered in an open and transparent way?	Yes in all standards
Have all comments received in public consultations been discussed and addressed in an objective and transparent way?	Yes in all standards
Were the criteria (requirements) in the standard agreed on in consensus?	Sustainable forest management (SFM) and Recreational standards – no, Christmas tree standards – I do not know. Not in consensus but by the majority.



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3. Environmental NGO	
Did you participate in the standard revision?	Yes in all standards.
Would you have been interested to participate?	<i>Not answered</i>
By whom and when were you invited to participate to the revision of standard for PEFC Forest certification?	By PEFC at an early stage
What was your main interest to consider participation to standard revision?	Environmental + SFM
In your view, have all interested parties relevant to standard revision been proactively identified and invited and given the possibility to participate and contribute to the standard revision?	Yes
Did the organiser provide you with adequate material before the process?	Yes
Did the stakeholders in the standard setting working groups represent the different interests in a balanced way?	Yes in all standards
Did the revision process follow the procedures that were communicated with participants in advance?	Yes in all standards
Were you aware of any substantive or procedural complaints by any stakeholder on standard revision?	No in all standards
Are you aware of any dispute settlement procedures in case of conflicting views in standard revision?	No in all standards
Do you believe any aspects of the standard or its revision process deserve further consideration?	Sustainable forest management (SFM) and Christmas tree standards – yes. Within the next revision process. Recreational – not answered.
Have you been given a meaningful opportunity to contribute to standard formulation and to submit comments for further consideration?	Yes in all standards
Were the views and comments submitted by any participant in the Standard Setting Working Groups considered in an open and transparent way?	Yes in all standards
Have all comments received in public consultations been discussed and addressed in an objective and transparent way?	Yes in all standards
Were the criteria (requirements) in the standard agreed on in consensus?	Yes in all standards



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4. Trade Union	
Did you participate in the standard revision?	Yes in all standards
Would you have been interested to participate?	Yes
By whom and when were you invited to participate to the revision of standard for PEFC Forest certification?	PEFC – Deutschland in 2013 – 2014
What was your main interest to consider participation to standard revision?	Socio-economic functions of forest (Part 6 – PEFC D)
In your view, have all interested parties relevant to standard revision been proactively identified and invited and given the possibility to participate and contribute to the standard revision?	Yes
Did the organiser provide you with adequate material before the process?	Yes
Did the stakeholders in the standard setting working groups represent the different interests in a balanced way?	Yes in all standards
Did the revision process follow the procedures that were communicated with participants in advance?	Yes in all standards
Were you aware of any substantive or procedural complaints by any stakeholder on standard revision?	Yes in all standards
Are you aware of any dispute settlement procedures in case of conflicting views in standard revision?	Yes in all standards
Do you believe any aspects of the standard or its revision process deserve further consideration?	Yes in all standards
Have you been given a meaningful opportunity to contribute to standard formulation and to submit comments for further consideration?	Yes in all standards
Were the views and comments submitted by any participant in the Standard Setting Working Groups considered in an open and transparent way?	Yes in all standards
Have all comments received in public consultations been discussed and addressed in an objective and transparent way?	Yes in all standards
Were the criteria (requirements) in the standard agreed on in consensus?	Yes in all standards



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5. Research institute / Consumer organisation / Member organization	
Did you participate in the standard revision?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Would you have been interested to participate?	No
By whom and when were you invited to participate to the revision of standard for PEFC Forest certification?	By PEFC Germany in September 2013. I think around that time.
What was your main interest to consider participation to standard revision?	Our main request was to bring in the results from our research and represent our members especially in regard to forest technology and best practices. Furthermore our main focus was on the whole tree utilization based on NMS (Nutrition Management systems).
In your view, have all interested parties relevant to standard revision been proactively identified and invited and given the possibility to participate and contribute to the standard revision?	Yes. To me and the Organisation and members I represent that's the main difference to FSC where you have to be a member to get influence on the process.
Did the organiser provide you with adequate material before the process?	Yes. In most cases
Did the stakeholders in the standard setting working groups represent the different interests in a balanced way?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Did the revision process follow the procedures that were communicated with participants in advance?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Were you aware of any substantive or procedural complaints by any stakeholder on standard revision?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Are you aware of any dispute settlement procedures in case of conflicting views in standard revision?	Sustainable forest management (SFM) – yes. Other standards – I do not know. And if not they were communicated very well by the working group moderator.
Do you believe any aspects of the standard or its revision process deserve further consideration?	Sustainable forest management (SFM) – no. Not at the moment. Other standards – I do not know.
Have you been given a meaningful opportunity to contribute to standard formulation and to submit comments for further consideration?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Were the views and comments submitted by any participant in the Standard Setting Working Groups considered in an open and transparent way?	Sustainable forest management (SFM) – yes. For me also an important difference with regard to FSC. Other standards – I do not know.
Have all comments received in public consultations been discussed and addressed in an objective and transparent way?	Sustainable forest management (SFM) – yes. Other standards – I do not know.
Were the criteria (requirements) in the standard agreed on in consensus?	Sustainable forest management (SFM) – yes. Not absolutely but seems to be impossible but they were based on a vast majority. Other standards – I do not know.



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Appendix 4

Summary of comments from the Panel of Experts

Panel of Expert Comments on the Indufor Report on the “Conformity Assessment of German Forest Certification Scheme for PEFC Endorsement, draft report”

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

- i. Whenever a 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.
- ii. When PoE challenged the conclusion made on a compliance, it was considered and reviewed against the applied assessment principles.
- iii. A description of potential changes made or not made with justification are given in the consultant’s response.
- iv. Editorial and grammatical corrections are not listed in this table.

Number	Report chapter /page	Consultant’s report statement	PoE member comment	Consultant’s response
1.			A very well written and laid out report.	-----
2.			While a relatively short assessment report, the consultant has satisfactorily completed the conformity assessment for the GFCS to a high standard. The depth of analysis of the PEFC Checklist certainly contributed to the standard of the assessment and as such, the report and checklist clearly demonstrate that the GFCS should be re-endorsed under the PEFC’s mutual recognition framework	-----
3.			There are a number of statements in the body text which on face value could be construed as a non-conformity, an observation or a recommendation e.g. Pages 15, 20 and 25 BUT Section 2 indicates that No important non-conformities were identified. For transparency of the assessment, any of these issues needs to be reported with a justification as to why it isn’t a non-conformity which would require a condition to be part of the re-endorsement recommendation from the consultant	The consultant’s comments for improvement that are not classified as a non-conformity are explained case by case below as addressed by PoE. A compilation of the comments is presented in the summary of findings in this report.
4.			The consultant has provided extensive	-----

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
			evidence of compliance in the PEFC Checklist with relevant document references, quotes from documents which address PEFC requirements and their own evaluation of GFCS documentation, German legislation and other documentation which in totality satisfies a conformity assessment	
5.			I would prefer to have a definitive statement on the conformity/compliance for every section in the Summary of Findings i.e. the statement in 3.6 is what I consider to be the most suitable wording which could be adopted for 3.2 to 3.8 (excluding 3.6) but adapted the PEFC element	Corrected to the main report p. 6 with a clear statement on compliance with a relevant PEFC Council document.
6.			Consider inserting the relevant documents of the GFCS that contributed to the conformity assessment at the start of each Part i.e. in the explanatory text before each table	Corrected. A list of GFCS document referred to PEFC checklist is presented at the beginning of each Part of the checklist (Appendix 1). The summary list of all GFCS documents is available in the main report in Tables 4.1 and 4.2 on p. 9-10.
7.			Remember if using direct quotes from the GFCS documents, place appropriate quotation marks on the text to distinguish actual requirements of the GFCS from consultant's comments as there seems to be a mix of quotes and comments which don't match the Explanations provided on Pg 2 of the PEFC Checklist	In the current report and Appendix 1 the quotes are presented as normal text and consultant explanations in italic. Observed confusions on quotes and comments are corrected. The comment to use quotation marks and/or write quoted text in italic in line with the common practice will be taken into consideration in future assessments.
8.			I would hazard to say that many 'comments' from the consultant aren't in italics as indicated based on the structure of the comment. The consultant needs to thoroughly review 'Comment' sections to ensure that their comments are distinguishable from the GFCS text	Observed confusions on quotes and comments are corrected.

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
9.			In Part III, has the consultant used bolding and underlining to identify the significant issues in the requirement? If so, it should be noted in the body text with an appropriate reference to its purpose.	Bolding and underlining is removed from Part III in the Checklist (Appendix 1)
10.	Acronyms and Abbreviations Pg iii		The following seem to have been missed: CBs; C&I; EU; FSC; ISO/IEC; NGOs; PEFC D; PEFC IGD; Reg. TFG	Added to the abbreviations list
11.	PREFACE Pg iv	'... decision on the potential endorsement of the ...'	Is it 'endorsement' or re-endorsement' as this will be the 4th occasion that the PEFC has been endorsed under the PEFC?	Corrected
12.	1.1, 1st para 1st and 2nd sent. Pg 1		There isn't a clear enough explanation of the relationship between PEFC Germany and the GFCC	A description of the role of GFCC has been added to the report: "The German Forest Certification Scheme (GFCS) is owned and operated by PEFC Germany, founded in 1999. The German Forest Certification Council (GFCC) is an executive body of the PEFC Germany responsible among others for electing the board, appointing working groups, passing decisions on certification criteria and adopting system description. GFCC organized the periodic review".
13.	1.1, 3rd para. Pg 1	'... PEFC Council on possible endorsement of the German Forest Certification Scheme.'	See comment under PREFACE	Corrected
14.	1.3 Chapter 2 ... Pg 2		See comment under PREFACE	Corrected
15.	2, 2nd para Pg 3	'No important non-conformities were identified.'	This implies that some non-conformities were identified but didn't impact on the integrity of the GFCS from the consultant's assessment. Is there a qualification required for this statement especially linking to the body text?	Term "important non-conformity" is changed to "significant non-conformity". A sentence "See section 3.2 on description of a minor technical non-conformity identified in the GFCS documentation" was added to the Recommendation. In Sec 5.3.1 p. 15 the issue is addressed.
16.	3.1 Pg 4	"standard does not stipulate	While certainly this criticism applies to the	PEFC D 3001 specify the general requirements

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
	7.1 7.2.1	operational forest management requirements for regional or forest management unit (FMU) levels, but it requires regions to develop regional plans.." "..as such, the regional requirements for forest management do not describe clear and auditable objectives. However, regional forest programmes specify the objectives (comparable to criteria) and their implementation to a level that is auditable" "The regional level requirements for forest management requirements are generic, mostly repeating the PEFC requirements"	environmental and social aspects the Appendix 1 Part 111 dealing with SFM seems to me to suggest the German federal scheme sets out fairly detailed and auditable requirements. The scheme is for a federal system with the states acting as regional entities and I do not think it is very different to the group requirements laid out in schemes for non-federal states. While certainly the federal requirements are necessarily generic this does not mean that they lack detail. Perhaps the reviewers are being a little too critical here??	
17.	3, 2nd and 3rd paras.	'... does not alone comply with PEFC requirements for forest management'	If so, how is compliance achieved by the GFCS?	A reference to section 3.3 is added to 2 nd paragraph in order to provide a more detailed description on the different levels of forest management requirements in the GFCS: regional and FMU level standards, regional action programme as well as valid regulations.
18.	3.2, 1st para Pg 4 3rd para 3rd para	'... PEFC D 4001:2014 ...' '... and they shall be in force by January 1, 2015.' '... (PEFC D 1004 and 2002-1), ...'	In Table 4.1, the year is 2013! As it is Sept 2015, it is past tense, so is it 'they came into force on 1 January 2015'? For all the standards, consider a dot point format for ease of reading The D 2002-1 isn't in the Tables of standards and documents?	Corrected. The correct year for PEFC D 4001 is 2013. Document PEFC D 2002-1 added to the Table of standards and documents.
19.	3.3, 2nd para Pg 5 2nd sent	'... Standard PEFC D 3001 on Tool for the definition ...' '... scope of the action programmes are.'	Table 4.2 indicates that it is only a Descriptive or Guiding Document, otherwise it would be in Table 4.1? What? Leaving the sentence as is, only begs	The incomplete sentence is removed

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
	3rd para	'.. and valid regulations set requirements ...'	the question! What are these? Need to use consistent language as this is the first time used! Was it used in a different context earlier in report?	The described in question 16. legislation and regulations at federal and state level complement the requirements set in regional, FMU level standards and in state level action programmes. References to legislation are indicated in Appendix 1.
20.	3.4 Pg 5	'... (PEFC ST 2002:2013)...'	As this is the latest version of the PEFC CoC standard, what date did the GFCC sign off on its adoption? The previous endorsement would have been to the previous version of the CoC standard, so need evidence of sign off to current CoC standard.	GFCS adopted the PEFC D ST 2002:2013 on September 2.,2014 Name des Dokuments: Produktkettennachweis für Holzprodukte ¹ - Anforderungen: Deutsche Übersetzung des Internationalen PEFC-Standards PEFC ST 2002:2013 "Chain of Custody of Forest Based Products – Requirements" ² Titel des Dokuments: PEFC D ST 2002:2013 Angenommen vom: Deutschen Forst-Zertifizierungsrat Datum: 02.09.2014, 26.11.2014 (neuer Titel) <small>¹ Holzprodukte: Übersetzung von „forest based products“, wörtlich „aus dem Wald stammende Produkte“, welche u.a. auch Papierprodukte mit einschließt ² Siehe www.pefc.org -> Standards -> Technical Documentation -> PEFC International Standards</small>
21.	3.5, Pg 5	'... PEFC Council international standard on logo use.'	As will all standards quoted, would insert the PEFC identifier to clarify	Corrected
22.	3.6, 2nd para Pg 5	'German national accreditation body (DAkks) shall accredit ...'	This is a normative statement – is this correct? Maybe it's just 'accredits' without the 'shall'?	Corrected
23.	3.7 Pg 5	'... chain of custody certification against (PEFC ST 2003:2013).'	Isn't it ST 2002? Also, don't require the quotation marks!	Corrected
24.	4.1, 10. Pg 7		Is this the PEFC's documentation if under this section?	Removed under own section 4.3.
25.	4.2 Pg 8	'... documentation of the Applicant Scheme ...'	Why introduce this term? Isn't it PEFC Germany or GFCC to be consistent in the report?	Corrected.

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
		'1) PEFC Germany has fully ...'	I can't see this note referenced in Table 4.1! May just need to have it as a 'NOTE:' rather than 1)	
26.	4.3, 1st para Pg 9	'Only three replies were received.'	For the (i), (ii) and (iii) – maybe use a dot point format In 1.2.2, 2nd para it is indicated that 5 replies were received!	Corrected
27.	5.1, Para 1 Pg 11 Figure 5.1	'... the PEFC International Standard (PEFC ST 2003:2012) for chain of custody standard.' 'Timber producing forest owners'	This is the standard for requirements for certification bodies not the chain of custody standard which is ST 2002:2013! As indicated earlier, maybe 'Wood' is a better term than 'Timber'?	Corrected
28.	5.2, 3rd & 4th paras Pg 12 7th para Pg 13 9th para	'... The GFCC has listed eight interest categories ... '... an issue that requires further justification.' '... relevant material on Internet and ...' '... was carried out in fall 2014 as appropriate.'	The 4th para has 10 'interest groups' – so which is correct 8 or 10? By whom? Really need to indicate the web page rather than the generalisation Fall (or Autumn) is different in the two hemispheres – so maybe best to indicate the moths to avoid any doubt!	Corrected. However, the text of standard states "eight" groups in text and 10 as bullet points Consultation in July –October 2014
29.	5.3.1, 1st para Pg 13 2nd para 4th para Pg 14 6th para	'10 days later a letter ...' '... on the official website of the organization.' 'At the end, the working group ...' 'These first drafts became available ...' '... consultations taking place during August 4 and October 3, 2014.' '... were prepared during October 2014 and ...' 'The fact that transition period ...'	Start sentence with word not number ie 'Ten' Why say this when previously have said the PEFC Germany's website? At the 'end' of what? Was it one draft or a number of drafts? OR Does it cover the group of standards? Is it 'between'? OR was it on these 2 days? Shouldn't the date of consensus approval by the WG be indicated here ie prior to the delivery to the GFCC?	Corrected. The meaning of the text was improved. Sentence specified: The transition period for documentation set by the GFCC started on the publication of the standards on December 1, 2014

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
			Which standard?	and will end by January 1, 2015 for forest management unit level standards and by January 1, 2016 for regional forest management standard.
30.	5.3.2		Is it possible to provide a date for the decision?	See question 20: 02.09.2014
31.	6, 2nd para Pg 15 3rd para 5th para 6th para Pg 17 7th para p. 18	'... thus does not alone comply with PEFC requirements for forest management.' '... that make a self-commitment.' 'The scheme shall clarify the contractual role of certification ...' 'GFCS is requested to clarify the conflicting requirements.' '... Guidelines and an example of managing procedures are requested.'	How is compliance demonstrated for conformity? Is it on behalf of the forest owners? Is this a recommendation of the consultant? If so, isn't it a non-conformity which requires a 'corrective action request' or a condition for re-endorsement? Is this a recommendation of the consultant? If so, isn't it a non-conformity which requires a 'corrective action request' or a condition for re-endorsement? From whom is it requested?	Amended with the sentence The standard PEFC D 3001 on "Tools for the definition of objectives and action programmes specify the detailed and practical elements of SFM an action programme must address and often specify required quantitative thresholds for certifiable forest management Forest owners' associations make a self-commitment on behalf of their members (forest owners participating in regional certification) The consultant's comment asks for clarification of the identified inconsistencies in the contract templates in order to assure that they are fully applicable as such also to certification of Christmas tree plantations and recreational forests. A comment for improvement, rather than a non-conformity or a condition for re-endorsement. The consultant's comment asks for clarification on information sharing on non-conformities between regional certifications if an applicant is part of several certifications. Classified as a comment for improvement. The CFCS does not disclose how regional working groups develop the action programme and monitor its implementation and how it is shared with forest owners. CFCS with the support of regional groups should share information with any interested forest owner to raise awareness of the system. Standard

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
				sets requirements for the procedures, but do not describe their implementation. Classified as a comment for improvement.
32.	7, 1st para Pg 17 4th para	'Action programmes describe procedures ...' '... objectives within the given period.' '... regional standard does not write out the applied ...' 'The SFM standard 1002-1 also applies in recreational forests.'	Is this an outcome of the standard? If so, need lead in text to link the two together for context. Use of 'the' would usually be provided with a figure – maybe 'a' is better? I don't understand 'write out' – is it reproduce? Can delete as it's a repeat of the previous sentence!	Corrected.
33.	7.2.1, 3rd para Pg 19	'Also, revision of forest programme ...' GFCS complies with the requirements of Criterion 1 of PEFC ST 1003:2020. “	Or is this the management plan? Isn't it 2010? Check all compliance statements under section 7!	No it is a Federal forest programme, any changes in it are reflected in regional plans and action programmes. The year is corrected to 2010
34.	7.2.2, 1st para Pg 20	'... Periodic revision of the plan and related ...' “Regarding chemical use, the standards require minimising the use of pesticides..”	What plan? Clarify. Perhaps there should also be a reference to fertilisers here as discussed under Criterion 3 para 5.2.12 on p81 of the Appendix.	Regional forest programme and action programme for regional certification Added. <small>Regarding chemical use, the standards require minimising the use of pesticides and they [on EU and related national legislation (<i>Pflanzenschutzgesetz</i> (Federal Plant Protection Law), any restrictions on use of pesticides as well as rules for the appropriate application method, requirement for soil sampling and/or forest nutrition expertise as the basis for soil liming is in Forest Management and Christmas tree plantation standards.</small>
35.	7.2.7, 3rd para Pg 23	The specific requirements for planning are quite generic on consideration on environmental and social aspects that are largely taken into account through legal compliance to the regulations on forest management of production forests or forests under any of the diverse	Is this a non-conformity or an observation? The consultant's text seems to indicate a recommendation! Notwithstanding the comments above this does seem to be a valid criticism, a solution for which is suggested. in the quote under 7.2.7	The Consultant has asked for extracts/references to regulations/legislation on issues that are not adequately addressed in the standard. So that information is available for the assessment, but it should be also referred in the relevant standards in order to communicate clearly the requirements for certification. Classified as a comment for improvement

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
		protection statuses in Germany.” “The GFCS scheme requires compliance with legislation. However the standard should be more informative and specify the legislation relevant to environmentally, socially and economically sustainable forest management. Appropriate reference would also ensure that legal compliance is taken into consideration in regional and FMU level audits as appropriate.”	repeated below. The GFCC should be asked to provide details of the relevant legislation, state by state, at least in their next revision and perhaps as an appendix to be added to this version in the next year.	
36.	8 Pg 24		Would indicate when adoption undertaken and indicate the identifier of the CoC standard to avoid any doubt	See question 20. Adoption date and identifier added.
37.	9.1, 1st para Pg 22 2nd para 3rd para 8th para	‘... are based on PEFC D ST 2001:2008 ... ‘According to PEFC D 4006:2014 an ...’ ... has developed a standard PEFC D 2001-1 on ...’ ‘... with PEFC chain of custody standard (PEFC D 2002:2014 in the GFCS).’	ISO 17012 is referenced but there is no such ISO standard – possibly incorrectly typed in for ISO 17021? I can't see this standard referenced in Table 4.1? OR in Table 4.2? I can't see this standard in Table 4.1 or 4.2? This standard isn't in Table 4.1 or 4.2? This standard isn't in Table 4.1 or 4.2?	Corrected
38.	9.2, 2nd para, Pg 23 6th para	‘... specifications for regional logo use (PEFC D 2002-1) ...’	It is indicated in the 2nd last paragraph of 9.1 (Pg 22) that its 2001-1?	Corrected
39.	10.1, 1st para Pg 24 2nd para, ii.	‘... GFCS applies the PEFC standard as required ...’ ‘... shall explicitly include PEFC D ST 2002:2013.’	Would include the PEFC identifier so as to avoid any doubt Should this be included in the list of standards in Table 4.1 even though it's the German adoption of the PEFC standard?	Corrected
40.	10.3.1, Pg 27	The GFCS requirements for accreditation in forest management	Would prefer to see a bolded statement at the end of each relevant section as the conclusion	Taken in to consideration as deemed appropriate

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
		and chain of custody certification conform ...	– this avoids any doubt on the findings of the consultant	
41.	10.3.2 Pg 27	'... A request to clarify the principles of defining ...'	What is the status of a 'request'? Is it a non-conformity or an observation. Does it require action for the endorsement recommendation? If introduce a new concept in conformity assessment not defined in Box 4.1, it needs an explanation.	Consultant requested better transparency on disclosing the definition of fees for notification of certification bodies. Full transparency is not required but it would provide additional assurance on non-discriminatory procedures. Classified as a comment for improvement.
42.	12.1 Pg 28	'PEFC Council launched the international consultation on the GFCS.'	Need to include the specific dates	Added on 18 February - 20 April 2015. Added the following text below Box 4.1: Consultant may also present comments on GFCS documentation and propose improvements on the issues that cannot be classified as non-conformities but would improve the quality and clarity of GFCS documentation or implementation.
43.	12.2 Table 12.1	'Respondents had one week to reply ...'	Was the one week a long enough time period considering the response rate! Maybe two weeks would have been more practicable! Need to align the comments with the interest groups as seems to be a formatting problem!	Due to a tight schedule for conducting the assessment of the GFCS, respondents of the questionnaire had just one week for commenting on the standard revision process. However, 3 out of 5 responses were received after the one-week deadline but have been still included into the assessment.
44.	Part I 4.1 d) ProcedurePg 6	'ch. "Final decision"	Is this a separate chapter?	Yes it is.
45.	4.2 Process Pg 7		If the screen shots (maybe need appropriate labels) support the consultants' comments or the GFCS requirements, refer to them in the text eg Picture 1. This would apply for subsequent screen shots.	All screen shots have been numbered accordingly and got a reference in the text.
46.	4.3 Process Pg 9	'Examples of minutes' ch. Of PEFC D 4001	Presume these are of the standard setting meetings – clarify to avoid doubt Spelling – 'of	The GFCS written procedures for standard setting clearly indicate that the minutes are related to the standard setting process.

Number	Report chapter /page	Consultant's report statement	PoE member comment	Consultant's response
47.	5.3 Process Pg 17		See comment for 4.2	All screen shots have been numbered accordingly and got a reference in the text.
48.	5.3 a) Process Pg 19		See comment for 4.2	All screen shots have been numbered accordingly and got a reference in the text.
49.	5.3 b) Process Pg 21	'... printed journal "Holzzentralblatt" on ...'	See comment for 4.2 Translation of journal?	All screen shots have been numbered accordingly and got a reference in the text. Writing corrected to Holz-zentralblatt. 'Holz-Zentralblatt' is Germany's leading trade journal for the forestry and woodworking industries (http://www.holz-zentralblatt.com/hz/International/Woodworking_eng.asp)
50.	5.3 e) Process Pg 22		See comment for 4.2	All screen shots have been numbered accordingly and got a reference in the text.
51.	5.4 Procedures Pg 23	NO	There doesn't seem to be an argument for this assessment. No consultant's comments as no text in italics!	Changed to YES.
52.	5.5 c) Process	CHECK DROP BOX	Is this an internal comment left in the text?	Deleted.
53.	5.6 a) Process		See comment for 4.2	All screen shots have been numbered accordingly and got a reference in the text
54.	5.6 b) Process	'Posted on Internet'	Would indicate the URL as substantive evidence	Changed to "posted on www.pefc.de "
55.	5.6 c) Process		See comment for 4.2	All screen shots have been numbered accordingly and got a reference in the text
56.	5.6 f) Process	Italics added by Indufor	Presume this was as a clarification from PEFC Germany?	Yes
57.	5.8 a) Process Pg 32	YES	This assessment seems at odds with the main 5.8 finding ie consensus by e-mail!	Added - also email voting was used.
58.	5.10 Process Pg 36-37		See comment for 4.2	All screen shots have been numbered accordingly and got a reference in the text
59.	5.12 Process Pg 38-41		See comment for 4.2	All screen shots have been numbered accordingly and got a reference in the text
60.	6.3 Process Pg 43	NO Considered as a minor non-	This should be reported under the Recommendation but with a no action required. Maybe some advice that PEFC	The minor non-conformity is reported under recommendation and described under section 3.2.

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		conformity	International informs PEFC Germany of the one year period for adherence in future revisions. While it was published on 1/12/14 after approval on 26/11/14, there would have been no consequences if it had been delayed and published on 1/1/15	
61.	6.4 Process	NO	See comment at 6.3	See comment above
62.	Part II 4.1 c) Pg 46	'forest owners participating through a forest owners association acting as an intermediary body'	Is this dot point d)?	Corrected
63.	4.2.1 e) Pg 51 Pg 54	'ch. 4.4 of PEFC D 1001 ...' Screen shot of document	Need to link the 'written agreement' to the conformity for this requirement Is this an English translation of a GFCS document?	Voluntary self-commitment is the GFCS translation. The commitment is the required written agreement.
64.	Part III 4.1c) Pg 58	'7.2.1.1.5 ...'	Which document?	Corrected
65.	5.1.2 Pg 65	'PEFC ST 1003, ch. 4.1 a) ...'	The assessment doesn't seem to tackle the cycle concept of the elements of continuous improvement. The Regional Forest Report seems to concentrate on the inventory cycle – the PEFC requirement is about much more than inventory. Is this a consultant's comment?	The consultant explanation on consideration of social and environmental aspects and their improvement are based on additional information provided by the GFCS. Explanation is written by consultant, thus it is in italic.
66.	5.1.9 Pg 69	'Advised use of machinery, ... of PEFC D 1001.'	This text should be at the end of the section – it is out of order as dealing with damage which is at end of requirement	Corrected
67.	5.2.1 Pg 72		These are specific measures whereas the requirement is about planning – maybe more comprehensive coverage is in Regional Forest Reports?	The regional level planning and reporting address the health and vitality of forests in a larger scope as requested by PEFC requirements. Explained by consultant in italic.
68.	5.2.2 Pg 72		The main evidence of compliance is through indicators – what is the level of compliance required?	The text in an indicator in PEFC D is explicit and complies with PEFC requirement. The formulation of the requirement is more important than its classification as a criterion or indicator.

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69.	5.2.3 Pg 73		Is this a direct quote? If so, from where? If its consultants reasoning, shouldn't it be in italics? Doesn't really provide an assurance that the GFCS has covered this requirement..	Changed to italics The PEFC D 1001 Annex 1 Indicator 4 explained in PEFC requirement 5.2.2 specifies the scope of monitoring and applies also to 5.2.3. Reference added
70.	5.2.4 Pg 78	'... (Equal to PEOLG ch..ch., 1.2)'	Where is the balance of the evidence for this requirement?	The regional forest standard set general requirements, partly copied from PEOLG, and PEFC D 3001 asks to specify the objectives and measures to reach them. FMU level standards require in addition avoidance of harvesting damage. PEFC D 1001 Indicators corrected to 12 and 13, added PEFC D 3001.
71.	5.3.7 Pg 86	'In Germany, hunting and fishing is regulated, monitored and controlled by the state.'	This only addresses hunting and fishing – what of the other non-timber forest products? Just can't review the example quoted in the requirement! From other requirements, the evidence seems to be available so other non-timber forest products must be reviewed.	Hunting and fishing requires a permit, other freely available non-timber products (berries, mushrooms, herbs (if not protected) are do not require a permission and can be collected if no special restrictions apply.
72.	5.3.8 Pg 90	'PEFC D 1001 / PEOLG 3.2 d ...'	Isn't this a copy of the PEFC requirement? See 5.4.1 for further comment	Yes the PEFC D 1001 is a copy of PEFC requirement as it is indicated (also a copy of PEOLG)
73.	5.4.1 Pg 91	'Indicators 23, 25 of PEFC D 1001: 4.1 a ...' 'Annual monitoring/auditing and periodic revision of the Regional plan ...'	It is not exactly a copy as 'should' replaces 'shall' of the PEFC requirement Is this the Regional Forest Report?	Correct – but in the context of the standards, the word “should” shall be interpreted as a mandatory requirement. Regional forest report is updated with the cycle of national forest inventory but regional groups shall do annual monitoring as required in PEFC D 7.1.2.2.3 - 7.1.2.2.6.
74.	5.4.8 Pg 93	'4.2 b Forest management practices ...'	It is not exactly a copy as 'should' replaces 'shall' of the PEFC requirement	See response to question 72
75.	5.4.10 Pg 94	'... a critical level (0.4) without ...'	What is the 0.4?	The text is a copy of standard, describes a value used for stock density.
76.	5.4.13 Pg 100	'Indicator 24 of PEFC D 1001 ...'	This is a copy of PEFC requirement but it is not exactly a copy as 'should' replaces 'shall'	See response to question 72

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			of the PEFC requirement	
77.	5.5.1 Pg 97	'PEOLG 5.1 b ...'	This is a copy of PEFC requirement but it is not exactly a copy as 'should' replaces 'shall' of the PEFC requirement	See response to question 72
78.	5.6.14 Pg 110	'There are 4 forestry universities, 5 ...'	Is this a quote or is it a comment? If a comment, it should be in italics!	Corrected
79.	Part IV 5 Pg 116	'... PEFC standard PEFC 2003:2013 for the ...'	Isn't it 2012?	Corrected
80.	22 Pg 125	'Initial certification shall bear accreditation mark.'	Need to identify the clause for clarity if this is a quote? It is normal that all certificates issued under accreditation shall bear the accreditation mark.	Consultant's explanation. Changed to italics Added: "Section 9.2.5.2 of PEFC D 1003-1 states that "The certification body issues to the regional working group a certification document that shall include at least...e) Accreditation mark as prescribed by the accreditation body (including accreditation number where applicable)".
81.	26 Pg 132	'Notification procedures and contracts are comprehensive and consistent.'	Is this a quote?	Consultant's explanation. Changed to italics
82.	27 p. 132	Any accreditation body meeting the PEFC requirements is eligible for notification in chain of custody certification.	I believe that it is a misspelling. I think it would be: Any certification body ...	Corrected
83.	Part VI 2 Pg 130	PEFC D 4006:2014 are the written procedures PEFC D 4006 is a procedural document that is based on PEFC D ST 2001 and PEFC Council Guideline 1005:2012.. That ensures compliance of logo users with PEFC D ST 2001. The PEFC D ST 2001 on logo use is identical to PEFC ST 2001.	This document isn't in the Tables of the PEFC D documents. The PEFC Council Guideline isn't included in the list of PEFC documents in 4.1. The PEFC Council ST isn't included in the list of PEFC documents in 4.1 If the documents are provided in the listings and titles align with the requirement, no doubt would agree with conformity	PEFC D 4006:2014 added to the table of GFCC documentation. PEFC Council Guideline 1005:2012 describes procedures PEFC Council applies when it issues the logo use licenses to entities located in a country without the PEFC authorised body. The document does not apply to GFCS but is taken into consideration in drafting PEFC D 4006.
84.	3.6/5	German national accreditation body (DAkKS) shall accredit the certification bodies doing forest management certification.	It is not normal to give a monopoly to one accreditation body. It is against the principles of the IAF MLA. I recommend PEFC to follow up if this cause problem for certification bodies.	For PEFC to consider

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85.	5.1/11	Accreditation requirements for forest management and chain of custody certification are slightly different following the respective PEFC Council requirements.	The accreditation requirements differ from the IAF (MLA) which accept accreditation by any accreditation body that complies with the rules of IAF (MLA). I recommend PEFC to follow up if this cause problem for certification bodies.	For PEFC to consider



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