



Final Report for the assessment of the revised PEFC Luxembourg  
Forest Certification Scheme against the PEFC Council Requirements

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- Mr. Mark Edwards, Mr. Hannu Valtanen and Mr. Stefan Czamutjian (Panel of Experts)
- All respondents to the Stakeholder Survey

## ACRONYMS AND ABBREVIATIONS

BoD	PEFC Luxembourg's Board of Directors
CB	Certification Body
Ch.	Chapter
CoC	Chain of Custody
EUTR	European Union Timber Regulation
FM	Forest Management
GA	PEFC Luxembourg's General Assembly
Ha.	Hectares (unit for superfide)
IAF	International Accreditation Forum
IGD	Informative Guide Document
ISO	International Organization for Standardization
LFCS	Luxembourg Forest Certification Scheme
LFCS PD	LFCS - Procedural Document
LFCS ST	LFCS – Standard
PEFCC	PEFC Council (also referred to as the PEFC Secretariat)
PEFC Board	PEFC Council Board of Directors
PoE	Panel of Experts
TC	Technical Committee
TFG	Task Force Group. An ad-hoc group comprising one or more persons, to investigate an accepted complaint or appeal.

## 1. INTRODUCTION

### 1.1 Background of the Luxembourg Forest Certification Scheme

PEFC Luxembourg governs the “Luxembourg Forest Certification Scheme” (LFCS) that was first endorsed on 12 August 2005, 3 years after PEFC Luxembourg joined PEFC International (22 November 2002). After its first revision, the LFCS was again adopted on 18 June 2009 and then re-endorsed by the PEFC Council ([www.pefc.org](http://www.pefc.org)) on 28 July 2010. This endorsement is valid until July 2015. For the endorsement after July 2015 a comprehensive revision of the scheme had to be started before July 2013 (no later than December 2013) so that this revised scheme could be completed and adopted on 18 June 2014 (five years from the adoption of the scheme on 18 June 2009) and the revised scheme could be submitted for the PEFC re-endorsement by July 2014 (no later than November 2014).

However, in November 2010 the PEFC Council revised its core requirements with a 30 months transition period at the end of which (May 2013) all PEFC endorsed schemes shall submit evidence on the compliance with the new requirements. Due to the foreseen comprehensive revision of the scheme, PEFC Luxembourg has received an exemption from the PEFC Council deadline provided that the revised scheme is submitted for the re-endorsement no later than on 13 August 2013. Therefore PEFC Luxembourg decided to start full revision of the LFCS in 2013 with the target of delivering the application for the PEFC re-endorsement by 13 August 2013. The revision process was started by PEFC Luxembourg in early 2013, based on the revision project proposal that was approved by the PEFC Luxembourg’s Board of Directors (BoD) on 7 February 2013.

### 1.2 Scope of the assessment

The scope of this assessment is to compare the revised “Luxembourg Forest Certification Scheme” (LFCS) against the PEFC Council (PEFCC) standard requirements. This report shall form an objective basis for the decision making process of the PEFCC (PEFC GD 1007:2012) and provides a recommendation to the PEFCC Board (PEFC Council Board of Directors) on the re-endorsement of the revised LFCS.

The PEFCC Standards and Guidelines used in the conformity assessment are listed in chapter 1.5. An overview of the LFCS documents is provided in chapter 1.6. Besides assessing the conformity between both scheme documentation, other aspects of the LFCS that might affect its functionality, credibility and efficiency were assessed as well.

This conformity assessment report has been structured according to PEFC IGD 1007-03:2012 and PEFC Secretariat’s clarification concerning the content of the assessment report (clarification 30/10/12).



### 1.3 The assessment procedure

The conformity assessment was conducted in accordance with the procedure prescribed by PEFC:

#### 1.3.1 Preliminary desk top-study

The first stage of the assessment consisted of a preliminary desk study in which a short initial assessment of the conformity of the LFCS was conducted. This assessment enabled the identification of any missing information, similarities and differences between the two standards (PEFCC and LFCS).

##### General analysis of the structure of the LFCS

A first review of the LFCS documentation was conducted to investigate if additional documentation was required, such as relevant forestry legislation, national policies, etc. Also an analysis on the general structure of the LFCS was carried out of the following aspects:

- The components of the scheme (requirements, principles, criteria, indicators, standards of performance, guidelines, etc.),
- The way the scheme was developed (standard setting procedures & processes, history),
- Objectives of the scheme and the procedures concerning monitoring, controlling, etc. This analysis gave insight into the functionality of the scheme and provided vital background information to enable a good comparison with the PEFC international requirements.

##### Analysis of the contents of the LFCS

Based on the PEFC Technical Documents a comparison was conducted between the PEFC Standards and Guidelines (An overview of these documents is provided in chapter 1.5 of this report) and the LFCS (An overview of these documents is provided in chapter 1.6 of this report).

#### 1.3.2 Public consultation period

From the start of the assessment period, the public was invited by PEFC International to provide comments on the LFCS documentation. The public consultation period started on 19 August 2013 and was completed on 19 October 2013. No comments were received during this 60 day public consultation period.

#### 1.3.3 Stakeholder Survey

The stakeholder survey queries the stakeholders and checks on the basic content of the development report on the standard setting process as described in PEFC 1001:2010, Standard Setting – Requirements. The names, contact information and email addresses of the stakeholders were provided by the PEFC Luxembourg on 06 January 2014. This survey was conducted by the consultants of ForestSense between 15 January 2014 to 27 January 2014. All stakeholders received an email requesting them to participate in the survey, with a reminder email being sent on 24 January 2014.

#### 1.3.4 Preparation of a Draft Report

Based on the results of the first evaluation, the public comments (public consultation) and the stakeholder survey, a Draft Report was prepared. The Draft Report is structured according to the PEFC Guideline: *Endorsement and Mutual Recognition of National Systems and their Revision (PEFC GD 1007:2012)*.

The Draft Report was presented to both PEFC Luxembourg and the PEFC Council for comments and enabled both PEFC Luxembourg and the consultant to form a clear understanding of the key issues raised during the first evaluation of the conformity assessment. PEFC Luxembourg was provided the opportunity to clarify or solve any possible non-conformities that were identified by the consultant.

### 1.3.5 Preparation of a Final Draft Report

On 31.01.2014 a conference call was held between the consultants (Mrs. Bea Groenen and Mr. Edmond Muller) and PEFC Luxembourg (Mr. Michel Dostert and Mr. Jaroslav Tymrak) to discuss the findings in the Draft Report and the identified non-conformities. Also the context of the LFCS and its embedding in national (forest) legislation were also explained and clarified in more detail by PEFC Luxembourg during this conference call.

On 07.02.2014 the consultant received additional documentation including a written response from PEFC Luxembourg on all the non-conformities that were identified during the first evaluation (draft) stage. The documents also included a corrigenda of LFCS ST 1003 Group Certification, adopted on 06.02.2014. Also an email with three questions was sent by the consultant on 07.02.2014 to PEFC Council with a request for clarification on a few PEFC Council criteria. All information from these processes was included in the Final Draft Report.

### 1.3.6 Preparation of the Final Report

The conformity assessment was finalized on the basis of the feedback obtained from the PEFC Council's Panel of Experts (PoE) review on the Final Draft Report. Based on this feedback a Final Report was elaborated (as presented here). This Final Report was submitted to the PEFC Council and to PEFC Luxembourg in both .pdf and .doc format. The Final Report also includes a summary, clearly stating the consultants findings and recommendations regarding the conformity of the LFCS with the PEFC Council requirements.

## **1.4 The methodology applied for this assessment**

The methodology that was applied for this assessment is a desk-top study. No field visit was carried out prior to or after the desk-top assessment.

### 1.4.1 First screening of tender documentation

ForestSense carried out a first screening of the LFCS based on the PEFC Council scheme documentation and the PEFC Luxembourg documentation (LFCS). Based on this review, an assessment methodology was proposed to PEFC Council, as presented in chapter 1.2. For the elaboration of the proposal, also additional information was taken into account, such as information provided in the PEFC Council tender, information on the PEFC Council website, etc.. In the proposal, a field visit was included as optional.

### 1.4.2 Assessment of the PEFC Luxembourg Forest Certification Scheme (LFCS)

The procedures for the endorsement of PEFC certification systems are based on *PEFC GD 1007:2012, Endorsement and Mutual Recognition of National Systems and their Revision*. All report versions that are submitted to PEFC Council are written in English and submitted in electronic format (Word and PDF) to the PEFC Council as well as to PEFC Luxembourg. All reports have been structured according to *PEFC IGD 1007-03:2012* and the PEFC Secretariat's clarification concerning the content of the assessment report (clarification 30/10/12). The Final Draft Report must be submitted within a target time of 10 weeks after the start of the conformity assessment, which was 20 December 2013 (= day of payment received on bank account of PEFC Council). All reporting material and other associated papers resulting from the assessment work will become the property of the PEFC Council.

## 1.5 Time table of the assessment

The table below shows the agreed timeline for the conformity assessment work. The timeline was approved for the consultant -by the PEFC Council and PEFC Luxembourg-, respectively on 02.01.2014 and 06.01.2014.

TIME LINE OF ASSESSMENT																
TASK	WEEK															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1. Official start conformity assessment	20 December 2013															
2. Public consultation period																
3. Technical desk study																
4. Stakeholder survey																
5. Draft Report																
6. Comments PEFC + PEFC Luxembourg																
7. Final Draft Report + recommendations																
8. Panel of Expert comments																
9. Final Report + recommendations																
10. PEFC Board decision																

## 1.6 PEFC Council standard & reference documentation

The PEFC standard, guide and reference documentation used in this assessment were:

PEFCC Standards	PEFCC international standards - Titles
PEFC ST 1001:2010	Standard Setting – Requirements
PEFC ST 1002:2010	Group Forest Management Certification - Requirements
PEFC ST 1003:2010	Sustainable Forest Management – Requirements
PEFC ST 2001:2008	PEFC Logo Usage Rules - Requirements
PEFC ST 2002:2013	Chain of Custody of Forest Based Products – Requirements.
PEFC ST 2003:2012	Chain of Custody Certification Body Requirements
PEFCC Guides	PEFCC Guides - Titles
PEFC GD 1001:2008	Structure of PEFC Technical Documents
PEFC GD 1004:2009	Administration of PEFC scheme
PEFC GD 1007:2012	Endorsement and Mutual Recognition of National Systems and their Revision
Other PEFC documents	
PEFC Terms and Definitions, Annex 1	
PEFC Council Technical Document, Annex 6	
Structure of assessment report according to PEFC IGD 1007-03:2012	

Clarification content assessment report according to PEFC Secretariat's clarification 30/10/12
Handouts of the PEFC Consultants' Training 2012

## 1.7 PEFC Luxembourg documents & sources

All documents provided by the PEFC Luxembourg and used during this conformity assessment were :

LFCS Standards	LFCS Standards - Titles
LFCS ST 1001:2013	Luxembourg Forest Certification Scheme – Introduction
LFCS ST 1002:2013	Sustainable forest management – Criteria and indicators
LFCS ST 1003:2013	Group forest management certification – Requirements (First edition)
LFCS ST 1003:2013	Group forest management certification – Requirements (technical corrigenda No. 1 was adopted on 2014-02-06) (Second edition)
LFCS ST 1004:2013	Requirements for bodies providing audit and certification of FM (Forest Management)
PEFC- LFCS ST 2001:2008	PEFC Logo usage rules - Requirements
PEFC - LFCS ST 2002:2010	Chain of custody (CoC) of forest based products - Requirements
PEFC - LFCS ST 2002:2013	Chain of custody (CoC) of forest based products - Requirements
PEFC - LFCS ST 2003:2012	Requirements bodies providing audit & certification CoC
LFCS Procedural documents	LFCS Procedural documents - Titles
LFCS PD 1001: 2013	Standard setting procedures
LFCS PD 1002: 2013	Procedures for investigation, resolution complaints & appeals
LFCS PD 1003: 2013	Issuance of PEFC Logo licenses
LFCS PD 1004: 2013	Notification of certification bodies
Lists of comments during standard setting	
(3.1) Comments from the TC members, 05.06.2013	
(3.2) Comments from public consultation, 07.06.2013	
Analytical papers and proposals	
(4.1) Revision of PEFC Luxembourg forest certification scheme (en), Project proposal, 2013.02.08	
(4.2) Revision of PEFC Luxembourg forest certification scheme (de), Project proposal, 2013.02.08	
(4.3) Stakeholders mapping table (2 versions available)	
PEFC Luxembourg Checklist 2013-08-01	
Documentation relating to the Technical Committee (TC)	
(5.1) Minutes of the TC meeting on 2013-03-11 (fr)	
(5.2) Minutes of the TC meeting on 2013-04-30 (fr)	
(5.3) Minutes of the TC meeting on 2013-06-03 (fr)	
(5.4) Minutes of the TC meeting on 2013-07-08 (fr)	
(5.5) Communication from the Secretariat to TC members	

Standard setting report 2013-08-01
Documentation relating to PEFC Luxembourg Board of Directors (BoD) and the PEFC Luxembourg's General Assembly (GA)
(6.1) Minutes of the BoD meeting on 2013-02-07 (de)
(6.2) Minutes of the BoD meeting on 2013-02-23 (de)
(6.3) Minutes of the BoD meeting on 2013-07-19
(6.4) Minutes of the GA meeting on 2013-07-31
(6.5) Minutes of the BoD minutes on 2014-02-06

PEFC Luxembourg press-releases and communication
(7.1) PEFC Luxembourg website: Announcement of the revision start (fr) : PEFC Luxembourg commence son processus de révision! ( <a href="http://www.pefc.lu/fr/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0">http://www.pefc.lu/fr/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0</a> )
(7.2) PEFC Luxembourg website: Announcement of the revision start (de) : PEFC Luxemburg beginnt seinen Revisionsprozess! ( <a href="http://pefc.lu/de/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0">http://pefc.lu/de/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0</a> )
(7.3) Press release: Announcement of the revision start (fr): PEFC souligne sa position de leader et entame la prochaine étape : Deuxième révision du «Schéma Luxembourgeois de Certification Forestière (2013-02-06)
(7.4) Programme of the conference on the implementation of the EUTR regulation in Luxembourg (2013-02-07)
(7.5) A letter to stakeholders with the announcement of the revision process and invitation to the TC (2013-02-06), including a list of recipients PEFC Luxembourg – Standard setting report 2013 18
(7.6) Wort (a national newspaper, 2013/02/21): Announcement of the revision process and stakeholders participation in the revision process.
(7.7) Le Quotidien (2013-02-13) : Protéger les forêts: l'enjeu des labels
(7.8) Announcement of the public consultation at the PEFC Luxembourg website (de, 2013-05-06) : Die öffentliche Konsultationsphase hat begonnen! <a href="http://pefc.lu/de/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0">http://pefc.lu/de/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0</a>
(7.9) Announcement of the public consultation at the PEFC Luxembourg website (fr, 2013-05-06) : La phase de la consultation publique vient de commencer! <a href="http://pefc.lu/fr/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0">http://pefc.lu/fr/index.php?nr=9&amp;name=aktuell&amp;ProgramID=528&amp;catid=0</a>
(7.10) Announcement of the public consultation at the lieler.net portal: Revision des Luxemburger PEFC Waldzertifizierungsschemas: öffentliche Meinung ist gefragt (2013-05-13) <a href="http://www.lieler.net/news/revision-luxemburer-pefcwaldzertifizierungsschemas-oeffentliche-meinung-gefragt.html">http://www.lieler.net/news/revision-luxemburer-pefcwaldzertifizierungsschemas-oeffentliche-meinung-gefragt.html</a>
(7.11) Announcement of the public consultation at the website of hunting association: Waldzertifizierung PEFC - öffentliche Konsultation, <a href="http://fshcl.lu/">http://fshcl.lu/</a>
(7.12) Announcement of the public consultation at the website of private forest owners association: Revision der PEFC-Standards: öffentliche Konsultation (2013-05-22) <a href="http://privatbesch.lu/index.php?id=31&amp;tx_ttnews%5Btt_news%5D=147&amp;cHash=9de83f489abbed0a2759c7a49b057cac">http://privatbesch.lu/index.php?id=31&amp;tx_ttnews%5Btt_news%5D=147&amp;cHash=9de83f489abbed0a2759c7a49b057cac</a>

(7.13) Revision des Luxemburger PEFC Waldzertifizierungsschemas: öffentliche Meinung ist gefragt (2013-05-10)
(7.14) Press release of PEFC Luxembourg, 2013-05-06
(7.15) Direct invitation of stakeholders to public consultation by E-mail (2013-05-06)
(7.16) PEFC Luxembourg's website: publication of the new scheme documentation, www.pefc.lu.
(7.17) Press release: revised scheme approved and published, www.pefc.lu.

<b>Documentation relating to the Draft Report</b>
PEFC Luxembourg's responses of 07.02.2014 to the Draft Report prepared by ForestSense .
Email of 12.02.2014 from PEFC: Questions about interpretation PEFC standards relating to the assessment of the LFCS

<b>Documentation relating to the Final Draft Report</b>
Panel of Experts comments relating to the Final Draft Report.

Furthermore the websites from PEFC (www.pefc.org) and PEFC Luxembourg (www.pefc.lu) were used as sources for information and documents/processes relevant for the assessment.

## 1.8 Consultants

The desk-top study that resulted in this assessment report was carried out by Edmond Muller (Senior Forestry Consultant) and Bea Groenen (Forestry Consultant) of ForestSense. In the report both persons are referred to as 'the consultant(s)'.

## 2. RECOMMENDATION

Based on the results from this conformity assessment, the consultant concludes that the revised Luxembourg Forest Certification Scheme conforms to the PEFC Council requirements with the exception of one minor non-conformity. The consultant recommends to the PEFC Board that it supports the re-endorsement of the revised Luxembourg Forest Certification Scheme on the condition that the following non-conformity is resolved by PEFC Luxembourg:

The minor non-conformity is related to the monitoring frequency and the auditing of certified forest areas. The monitoring frequency is not defined in the LFCS (LFCS ST 1002:2013): the monitoring frequency is only defined as 'periodically', which leaves room for arbitrary. The LFCS needs to clearly define a (minimum) monitoring period in order to monitor the performance of certified areas and to verify compliance with the sustainability objectives of the LFCS.

The consultant advises the PEFC Board that PEFC Luxembourg shall resolve the non-conformity within a time frame of 6 months, according to the LFCS standard setting procedures.

### 3. SUMMARY OF THE FINDINGS

#### 3.1 General structure of PEFC Luxembourg and the LFCS

PEFC Luxembourg has elaborated a well-structured, solid and comprehensive national PEFC Scheme (The Luxembourg Forest Certification Scheme, or abbreviated: 'LFCS'). The LFCS is clearly structured in its documentation and very user friendly and readable in its chapter setup and content. The scheme is elaborated in a bi-lingual 'twin-structure' (both in English and French/German) which contributes to the standards readability and transparency (One can easily compare the English content with the French/German content). All LFCS documents have a strong link with the standardization documents and requirements of the PEFC Council; at some points the LFCS documentation has elaborated requirements at a level above the PEFC Council criteria, for example the requirements for Certification Bodies (CB's) providing transparency of information during/after certification of clients.

Also regarding communication during the assessment, PEFC Luxembourg has proven to be a professional organization with a high degree of transparency and efficiency. The response time by the PEFC Luxembourg National Secretariat on requests for information was short and professional. PEFC Luxembourg National Secretariat also has sufficient knowledge of the content of the LFCS and it is well informed about the national forestry sector of Luxembourg in terms of juridical and technical aspects.

The LFCS describes the revision procedures and corresponding processes as well as the functioning of the national certification scheme. In this scheme a standard for group certification has been elaborated.

#### 3.2 Standard setting procedures and process

The standard setting procedures of the LFCS are clear and elaborate. Also as an organization PEFC Luxembourg is well structured and solid: decision making power is divided amongst four entities (1. General Assembly (GA), 2. Board of Directors (BoD), 3. PEFC-Luxembourg Secretariat and 4. Technical Committee (TC)) and the responsibilities of each entity are well defined in the scheme documentation.

The standard setting process in PEFC Luxembourg has a project-like approach: each stage of the standard setting process is described in sufficient detail, including the responsibilities and roles of each of the four entities in each stage. Also the voting procedures are defined as well as the procedures for consensus building.

The consultant made a few observations that have weakened the standard setting process of the revised LFCS. It is important to mention that these observations do not endanger the credibility of the scheme but resolving them will contribute to the robustness and transparency of the standard setting process and the overall quality of the scheme. As such, the consultant advises to resolve them in the future. The observations are summarized below:

1. A weakness is found regarding the active involvement of disadvantaged stakeholders in the TC for the standard setting process especially related to the factual text of the procedure (see LFCS PD 1001, chapter 5.3.1.2). It is not clearly stated that seeking active participation is needed; the text only requires to the 'identification' of disadvantaged stakeholders, not to actively involve them. However, when looking at the process carried out during the last



revision, the evidence (minutes, email correspondence) show that participation of all stakeholders was actively encouraged and that none of the stakeholders was excluded or neglected. Hence processes were carried out correctly as all types of relevant stakeholders were invited and no distinction seemed to be made. Therefore this is considered a weakness in the scheme.

2. According to PEFC ST 1001, standard setting is required for scheme specific CoC and forest management standards. As such, voting and consensus building during standard revisions apply to both standards. However PEFC Luxembourg decided to also include standard setting procedures for their other scheme documents, such as the '*Requirements for bodies providing audit and certification of forest management*' (LFCS ST 1004). From this perspective, PEFC Luxembourg is more ambitious than required by the PEFC requirements.

During the voting for standard LFCS ST 1004 by the TC, no clear evidence in the process documentation was found that a majority of voting was achieved, complying with the LFCS voting procedures (Voting procedures for the approval of standard documents are described in LFCS PD 1001).

The consultant considers the above mentioned process as a weakness in the standard setting process since their own voting procedures were not entirely respected, or at least not fully and transparently documented. Despite the fact that PEFC Luxembourg's own standard setting procedures seem to be not fully respected, the standard setting process conforms to the PEFC requirements, since the LFCS procedures go beyond those of PEFC and no evidence was found of disagreements with the standard setting process during the stakeholder survey.

3. Remark related to the documentation during the Standard Setting Process: The names of possible members and the appointment of members to be part of the TC (involved in the design of the LFCS) were not clearly documented as well as the process of their adjudication as participants to the user groups. The composition of stakeholders in one of the three user groups (Primary producers, Processors, Forest users) was not documented in the minutes of the BoD. Also the mandate given to the PEFC Luxembourg's National Secretary to allow other organizations to participate in the TC was not clearly clarified in the minutes. PEFC Luxembourg should improve its transparency by improving minute taking and documentation during the standard setting process.
4. Remark related to the "joint membership" by members of the TC during the Standard Setting Process: Appropriate procedures must be established that cover (or limit) alternative scenario's such as a "joint membership" for cases where new member organizations want to participate in the standard setting process after the commencement of the standard setting process. Accordingly, in respect to alternative scenario's, voting procedures must also be clearly described (e.g. how to deal with voting in case of a joint membership).

### 3.3 Sustainable Forest Management certification standard(s)

The Sustainable Forest Management Standard (LFCS ST 1002:2013) is clearly structured and comprehensive. Users of the scheme can easily find relevant topics and the wording of the standard is clear and understandable. The standard has also included relevant national forest legislation as an annex (Annex 2), which contributes to its comprehensiveness and readability. Furthermore, the LFCS

ST 1002:2013 also gives practical advice and information on forest management, subsidy and legislation on Luxembourg's forests in general.

The consultant found one (1) non-conformity for forest management. This non-conformity is related to the monitoring and audibility of certified forest areas. The scheme documentation only states that monitoring should be carried out 'periodically', without clearly defining the term 'periodically' in terms of (minimum) time-frequency. This does not enable auditors to verify the sustainability of the forest management that is applied on the certified areas. Hence, the LFCS must clearly define the time intervals (frequency) for forest monitoring in to become fully conform to the PEFC criteria.

### 3.4 Group certification model

Forest ownership in Luxembourg is characterized by a significant number of small forest holdings (<50ha). The limited financial income of small forest owners, periodicity of their management activities and revenues, limited access to information and knowledge as well as limitations relating to their conformity with some sustainable forest management criteria (which often cannot be achieved in small forest areas), represent significant barriers to forest certification for many forest owners in Luxembourg.

Group certification is therefore the best approach to forest certification, which allows forest owners to become voluntarily certified under one certificate and share the financial obligations arising from forest certification as well as the common responsibility for forest management.

PEFC forest management certification in Luxembourg can be carried out on either individual level (forest owner) or group level. However, due to the small size of the Grand Duchy of Luxembourg and the relative large number of small forest owners (<50ha) only one group organization has been created called 'Groupement des Sylviculteurs a.s.b.l.'. Any forest owner (large or small) in Luxembourg that is interested in becoming PEFC certified must enter this specific/unique group certificate. Large forest owners (>50ha) also form part of this group certificate but subscribe and sign a commitment on an individual basis to the group entity. The PEFC group certificate is jointly managed and administered by the 'Groupement des Sylviculteurs a.s.b.l.' and the State Forest Administration, which is a national governing body on forestry in Luxembourg.

The consultant has concluded that LFCS ST 1003:2013 conforms to the PEFC Council requirements.

### 3.5 Chain of custody standard(s)

The PEFC CoC standard (PEFC ST 2002:2010, including the most recent version PEFC ST 2002:2013) has been fully adopted by PEFC Luxembourg on 31 July 2013 (see PEFC/LFCS ST 2002:2010 and PEFC/LFCS ST 2002:2013, page 1). As such, the LFCS fully conforms to the PEFC requirements for CoC. Due to the full adoption of the PEFC CoC standard, no summary was made for PEFC/LFCS ST 2002:2010 and PEFC/LFCS ST 2002:2013 as this was not considered relevant.

### 3.6 Logo Usage

The PEFC Logo Usage Rules (PEFC ST 2001:2008) have been fully adopted by the PEFC Luxembourg on 31 July 2013, as stated on the title page (page 1) of scheme document PEFC/LFCS ST 2001:2008. As such, the LFCS fully conforms to the PEFC requirements for Logo Usage and it was considered as not relevant to summarize the scheme design.

### **3.7 Complaints and dispute resolution procedures**

Complaints and appeals must be sent to the PEFC Luxembourg Secretariat. When the complaint or appeal is accepted, the PEFC Luxembourg's Chairman shall assign an ad-hoc Task Force Group (TFG). The TFG shall investigate the complaint/appeal and provide a written report. The Board of Directors shall approve or disapprove the conclusions of the report, including its recommendations or remedial actions. Where the complaint or appeal concerns the decision of the General Assembly, the final decision is made by the General Assembly based on recommendation of the Board of Directors.

The LFCS documentation complies with all PEFC criteria for complaints and dispute procedures (PEFC GD 1004:2009, chapter 8). Hence, the consultant has concluded that the LFCS conforms to the PEFC requirement.

### **3.8 Certification and accreditation procedures**

The LFCS PD 1004:2013 'Notification of certification bodies' standard is based on ISO/IEC 17021:2011 and IAF (International Accreditation Forum) documents relating to the application of ISO/IEC 17021:2011. The following ISO normative documents are used in the LFCS: ISO/IEC 17021:2011; ISO/IEC 19011:2011; ISO/IEC 17011:2004 and ISO17065:2012.

Most of the PEFC requirements are covered by the LFCS documents. In cases that PEFC requirements are not directly covered by the LFCS documentation, referring to relevant normative ISO standards provide compliance with the PEFC requirements.

No non-conformities have been found by the consultant on the certification and accreditation procedures of the LFCS. As such, the LFCS conforms to the PEFC requirements for certification and accreditation procedures.

### **3.9 Any other aspects affecting functionality, credibility and efficiency of the LFCS**

Apart from the aspects already observed (non-conformity on monitoring and some weak aspects in the standard setting process) no other aspects have been found that affect functionality, credibility or efficiency of the LFCS.

## 4. GENERAL STRUCTURE OF PEFC LUXEMBOURG AND THE LFCS

### 4.1 General structure of PEFC Luxembourg

As an organization PEFC Luxembourg is well structured and solid: decision making power is divided amongst four entities of which three are permanent entities (governing & decision making) and one is temporary (scheme revisions):

- 1) The **General Assembly** (GA) is a permanent body, which is responsible for the formal approval of the scheme's standards.
- 2) The **Board of Directors** (BoD) is a permanent body fulfilling the following functions in the standard setting process:
  - Approval of the project proposal for Standard Revision;
  - Approval of the standard setting procedures;
  - Establishment and dissolution of a Technical Committee for scheme revisions;
  - Appointing a project leader responsible for the PEFC Luxembourg Secretariat's activities
  - Formal approval of procedural documents;
  - Recommendation of the final draft (FD) standards for formal approval by the GA.
- 3) The **PEFC Luxembourg Secretariat** is a permanent body which is responsible, inter alia, for the implementation of the standard setting procedures. For this purpose, the Secretariat arranges all contacts between the Technical Committee, and the Board of Directors. In particular, the Secretariat is responsible for:
  - Preparation of the standard setting and project proposal;
  - Preparation of the working draft and consequent drafts of documents;
  - Providing secretarial and administration support to the Technical Committee;
  - Announcing the start of the standard setting process;
  - Administration of the public and members consultations;
  - Records keeping.
- 4) The **Technical Committee** (TC) is a temporary body that is only active during the standard revision of the LFCS. The Technical Committee consists of balanced representation of the important stakeholders in Luxembourg that are grouped into 3 stakeholder groups. The committee's primary function is to revise the LFCS on SFM and CoC. The TC reports to the BoD. The TC can be dissolved by the BoD.

### 4.2 General structure of the LFCS

The LFCS is a user-friendly scheme: the structure of the scheme documents is logical and intuitive so that readers easily find the desired information. Its content is clearly written and the structure of the chapters is also clear. The scheme is elaborated in a bi-lingual 'twin-structure' (both in English and French/German) which contributes to the standards accessibility, readability and transparency (One can easily compare the English content with the French/German content). The LFCS has a strong link with the PEFC documentation. Some PEFC standard have been fully adopted by the LFCS, such as the PEFC CoC standard (including the most recent CoC standard PEFC ST 2002:2013), the PEFC

Requirements for Certification Bodies operating CoC certification, and the PEFC Logo Usage Rules. These fully adopted LFCS standards are clearly coded as *PEFC – LFCS ST xxx:xxx*. LFCS standards that are altered (according to the Standards Setting Procedures) are –also clearly- coded as *LFCS – ST xxx:xxx*. The LFCS also contains some procedural documents which are coded as *LFCS – PD xxx:xxx*. An overview of all LFCS documentation is provided in the first table of chapter 1.7.

The LFCS makes use of various ISO standards (latest versions) that are compulsory for certification: ISO 19011, ISO 17011, ISO 17065 (with changes to ISO 17021), and ISO 65. All scheme documents make a clear link to these ISO standards in case it is relevant. Furthermore, the LFCS has incorporated a strong link to national forest legislation by including links and even entire contents of national forest legislation as appendixes. This strongly contributes to the comprehensiveness of the scheme.

## 5. STANDARD SETTING PROCESS

The standard setting procedures of the LFCS are clear and elaborate. Also as an organization PEFC Luxembourg is well structured and solid: decision making power is divided amongst four entities (1. General Assembly (GA), 2. Board of Directors (BoD), 3. PEFC-Luxembourg Secretariat and 4. Technical Committee (TC)) and the responsibilities of each entity are well defined in the scheme documentation.

The standard setting process in PEFC Luxembourg has a project-like approach: each stage of the standard setting process is described in sufficient detail, including the responsibilities and roles of each of the four entities in each stage. Also the voting procedures are defined as well as the procedures for consensus building.

The consultant made a few observations that have weakened the standard setting process of the revised LFCS. It is important to mention that these observations do not endanger the credibility of the scheme but resolving them will contribute to the robustness and transparency of the standard setting process and the overall quality of the scheme. As such, the consultant advises to resolve them in the future. The observations are summarized below:

1. A weakness is found regarding the active involvement of disadvantaged stakeholders in the TC for the standard setting process especially related to the factual text of the procedure (see LFCS PD 1001, chapter 5.3.1.2). It is not clearly stated that seeking active participation is needed; the text only requires to the 'identification' of disadvantaged stakeholders, not to actively involve them. However, when looking at the process carried out during the last revision, the evidence (minutes, email correspondence) show that participation of all stakeholders was actively encouraged and that none of the stakeholders was excluded or neglected. Hence processes were carried out correctly as all types of relevant stakeholders were invited and no distinction seemed to be made. Therefore this is considered a weakness in the scheme.
2. According to PEFC ST 1001, standard setting is required for scheme specific CoC and forest management standards. As such, voting and consensus building during standard revisions apply to both standards. However PEFC Luxembourg decided to also include standard setting procedures for their other scheme documents, such as the '*Requirements for bodies providing audit and certification of forest management*' (LFCS ST 1004). From this perspective, PEFC Luxembourg is more ambitious than required by the PEFC requirements.

During the voting for standard LFCS ST 1004 by the TC, no clear evidence in the process documentation was found that a majority of voting was achieved, complying with the LFCS voting procedures (Voting procedures for the approval of standard documents are described in LFCS PD 1001).

The consultant considers the above mentioned process as a weakness in the standard setting process since their own voting procedures were not entirely respected, or at least not fully and transparently documented. Despite the fact that PEFC Luxembourg's own standard setting procedures seem to be not fully respected, the standard setting process conforms to the PEFC requirements, since the LFCS procedures go beyond those of PEFC and no evidence was found of disagreements with the standard setting process during the stakeholder survey.

3. Remark related to the documentation during the Standard Setting Process: The names of possible members and the appointment of members to be part of the TC (involved in the design of the LFCS) were not clearly documented as well as the process of their adjudication as participants to the user groups. The composition of stakeholders in one of the three user groups (Primary producers, Processors, Forest users) was not documented in the minutes of the BoD. Also the mandate given to the PEFC Luxembourg's National Secretary to allow other organizations to participate in the TC was not clearly clarified in the minutes. PEFC Luxembourg should improve its transparency by improving minute taking and documentation during the standard setting process.
4. Remark related to the "joint membership" by members of the TC during the Standard Setting Process: Appropriate procedures must be established that cover (or limit) alternative scenario's such as a "joint membership" for cases where new member organizations want to participate in the standard setting process after the commencement of the standard setting process. Accordingly, in respect to alternative scenario's, voting procedures must also be clearly described (e.g. how to deal with voting in case of a joint membership).

Observations on communication errors and typos:

5-3 Rapport reunion 03.06.2013, a wrong date is present in the title of the document: 30.04.2013, this is the date of an earlier meeting. This is however an official document in de Standard Setting Process, and no remark of this error can be found in the documents provided by LFCS.

LFCS PD 1001: The Contents, p3 displays an error, 5.6.1 Standard setting report/ Standardfestlegungsbericht ..... Erreur ! Signet non défini.

LFCS PD 1001: p15: after chapter 5.6 "Approval stage" is now stated: 5.6.1.1 "The Final draft shall be presented for the formal approval stage together with a standard setting report which provides ..." while the chapter number 5.6.1 would be logically expected. (similar for 5.6.1.2 and 5.6.1.3)

LFCS PD 1001: after chapter number 4.4 "Technical Committee" the next chapter is 4.5.1 "A permanent Technical Committee shall be established and dissolved by the Board of Directors. The Technical Committee shall report to the Board of Directors..." while chapter number 4.4.1 would be logically expected. (similar of course for 4.5.2-4.5.6)

LFCS PD 1001: p15: after chapter 5.5.2 "Pilot testing" is now stated: chapter 5.5.3.1 "The Enquiry draft of a new standard shall be tested through a pilot project and the results of the pilot testing shall be ..." while chapter number 5.5.2.1 would be logically expected.

## 6. FOREST MANAGEMENT STANDARD

The requirements of the LFCS concerning Forest management are documented in two standard documents of the LFCS:

- LFCS ST 1002:2013 Sustainable forest management – Criteria and indicators
- LFCS ST 1003:2013 Group forest management certification – Requirements

The LFCS ST 1002:2013, Sustainable Forest Management (SFM) has been written exclusively for the PEFC certification of Forests in the Grand Duchy of Luxembourg. These forests include public forests (state and Communes), large forest owners and very small forest owners (<50 ha). The LFCS standards were first endorsed in 2005, received a second endorsement in 2010, before submitting the present version.

The LFCS Sustainable Forest Management Standard (LFCS ST 1002:2013) is clearly structured and comprehensive. Users of the standard can easily find relevant topics and the wording of the standard is clear and understandable. The standard document has also included relevant national forest legislation as an annex (Annex 2) which contributes to the comprehensiveness and readability of the standard (LFCS ST 1002:2013, Annex 2). Furthermore, LFCS ST 1002:2013 also provides practical advice and information on forest management, subsidy and legislation on Luxembourg's forests in general.

One minor non-conformity related to the Forest Management Standard has been observed. The non-conformity concerns a clarification of a definition related to monitoring frequency and auditing:

### **PEFC ST 1003:2010 Chapter 4.1 point b:**

*“The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall b) be clear, objective-based and auditable.”*

According to LFCS ST 1002, chapter 5.1.4: *“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.”* The term periodically provokes arbitrariness in the monitoring of forest management which also affects the audit-ability of forest management.

Furthermore, LFCS ST 1002, chapter 5.2.2 states: *“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.”*

PEFC Luxembourg's argumentation for not specifying the term 'periodically' (see document 'Responses after draft report') is as follows: *“Chapter 5.1.4 includes requirements for monitoring. The periodicity of the monitoring will depend on the type of ownership, size of the forest property, as well as the factors to be monitored. Therefore the term “periodically” without further specification is appropriate here.”* Furthermore it was stated by PEFC Luxembourg: *“Chapter 5.2.2 relates to the monitoring of biotic and abiotic factors. The periodicity of this monitoring will depend on the factors influencing the forest property (each factor might have different need for periodicity); size of forest property, intensity of forest management, etc. Therefore the terminology used is appropriate.”*

The consultant does not agree with the argumentation of PEFC Luxembourg that forest monitoring frequency cannot be defined due to differences in forest area and the type of ownership (see



statement above). Forest monitoring is essential to verify if sustainable management objectives for certified forest areas are being accomplished. As such PEFC Luxembourg must at least define a minimum monitoring time-frequency. The consultant considers this as a minor non-conformity.

Observations on communication errors and typos:

LFCS ST 1002, p21, Ch 5.6.5 *“Forest owners, forest managers, contractors, employees and [???] shall be provided with sufficient information....”* [???] or and is a typo or there is missing a group of persons involved with pesticides.

LFCS ST 1002, p9, Ch 5.2.3 *“Forest management planning should make use of those policy instruments set up to support these activities.”* The wording ‘should’ must be changed to ‘shall’ in order to make the LFCS fully conform to PEFC criteria 5.2.4.

## 7. GROUP CERTIFICATION MODEL

The requirements of the LFCS group certification are documented in the second edition of LFCS ST 1003:2013. Group forest management certification – Requirements. The standard LFCS 1003:2013 has been written exclusively for the PEFC certification of Forests in the Grand Duchy of Luxembourg. The standard is clearly structured and comprehensive. Users of the standard can easily find relevant topics and the wording of the standard is clear and understandable.

The second edition of LFCS ST 1003 was formally approved by the Board of Directors of PEFC Luxembourg. The corrigenda (document: LFCS ST 1003 Group – corrigenda 1\_2014-02-06) was approved unanimously on 6 February 2014 by 3 Board member votes (see document: 6-5 BoD minutes 06.02.2014). The following adjustments were made to chapter 5.5 of the LFCS ST 1003: “...a statement that the participation in the group organisation can be terminated in case of major non-conformities”. Furthermore in chapter 6.1 of LFCS ST 1003, the reference to chapter 5.3 is changed to 5.5.

Forest ownership in Luxembourg is characterized by a significant number of small forest holdings (<50ha). The limited financial income of small forest owners, periodicity of their management activities and revenues, limited access to information and knowledge as well as limitations relating to their conformity with some sustainable forest management criteria (which often cannot be achieved in small forest areas), represent significant barriers to forest certification.

Group certification is therefore the best approach to forest certification which allows forest owners to become voluntarily certified under one certificate and share the financial obligations arising from forest certification as well as the common responsibility for forest management. This approach also aims at improving information disclosure and co-operation in forest management among individual forest owners.

PEFC certification in Luxembourg can be carried out on both individual level (forest owner) or group level. However, due to the small size of the Grand Duchy of Luxembourg and the relative large number of small forest owners (<50ha) only one group organization has been created called ‘Groupement des Sylviculteurs a.s.b.l.’. Any forest owner (large or small) in Luxembourg that is interested to become PEFC certified must enter this unique group certificate of ‘Groupement des Sylviculteurs a.s.b.l.’ (see LFCS ST 1003, chapter 4.5 and 4.6). Large forest owners (>50ha) also form part of a group certificate but subscribe and commit on an individual basis to this group entity (see diagram below). The PEFC group certificate is jointly managed and administered by the ‘Groupement des Sylviculteurs a.s.b.l.’ and the State forest Administration, which is a national governing body on forestry in Luxembourg. Figure 1 provides an overview of the model (copied from LFCS ST 1003:2013).

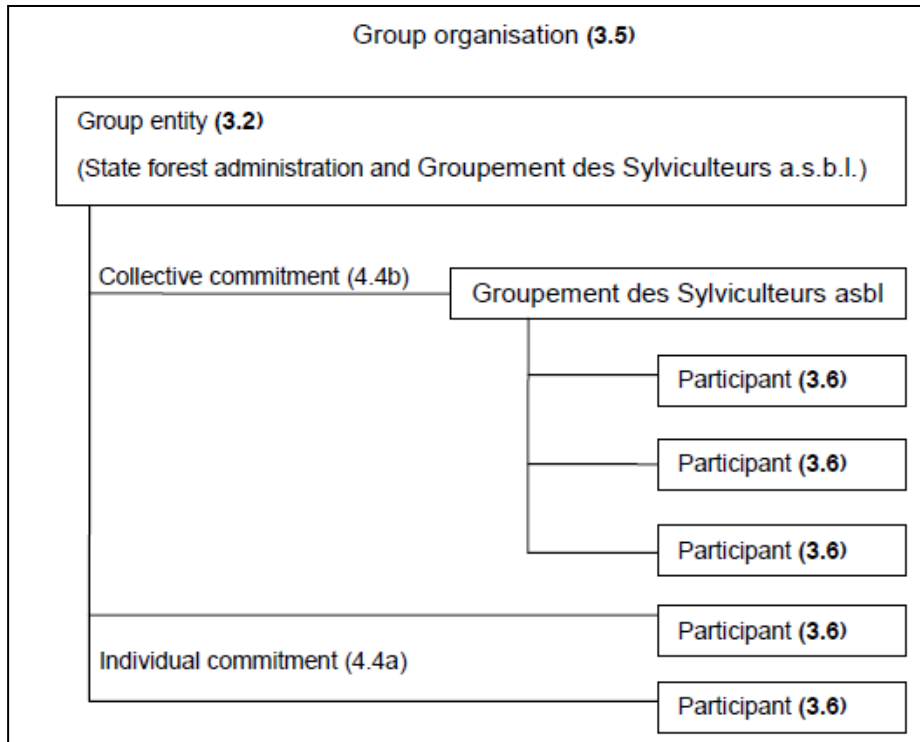


Figure 1: Group forest certification model PEFC Luxembourg

The group entity represents all its participants and has overall responsibility for ensuring the conformity of forest management in the certified area to the sustainable forest management standard and other applicable requirements of the forest certification.

The collective commitment of the Groupement des Sylviculteurs a.s.b.l. shall be taken based on a majority decision of the General Assembly of the Groupement des Sylviculteurs a.s.b.l. with the possibility of an individual forest owner to opt out from the commitment.

The application date of LFCS ST 1004 has been extended to 1 August 2015 (two years) with the transition period valid until the first certification or surveillance audit following the application date. This is based on very exceptional circumstances where there is only one forest management group certificate due to the size of the forests, and accreditation is provided by the German accreditation body and is strongly aligned with the German forest certification scheme. PEFC Luxembourg has decided to change from ISO 17065 to ISO 17021 (as also requested in PEFC ST 1004:201x, enquiry draft). This requires the accreditation body to develop a new accreditation programme based on ISO 17021 and the transition period has therefore been aligned with the changes in the German forest certification scheme. (source: Checklist provided by the LFCS).

The LFCS ST 1003:2013 fully complies with all criteria of PEFC ST 1002:2010. Hence, the consultant has concluded that the LFCS ST 1003:2013 conforms to the PEFC Council requirements.

## **8. CHAIN OF CUSTODY STANDARD**

The PEFC's International standard PEFC 2002:2010, Chain of Custody of Forest Based Products, was fully adopted by PEFC Luxembourg, without any modifications on 31 July 2013. See reference PEFC-LFCS ST 2002:2010, page 1. As such PEFC-LFCS ST 2002:2010 was not assessed.

On 24 May 2013, the PEFC Council also adopted the new PEFC standard for Chain of Custody of Forest Based Products: PEFC 2002-2013. This new PEFC CoC standard was also fully adopted on 31 July 2013 by PEFC Luxembourg (see reference: PEFC-LFCS ST 2002:2013, page 1). As such PEFC-LFCS ST 2002:2013 was not assessed.

## 9. PEFC NOTIFICATION OF CERTIFICATION BODIES

The standard LFCS PD 1004:2013 has been written exclusively for the PEFC certification of Forests in the Grand Duchy of Luxembourg. The standard is clearly structured and comprehensive. Users of the standard can easily find relevant topics and the wording of the standard is clear and understandable. Document LFCS PD 1004 describes procedures for the issuance of the notification to certification bodies operating forest management and chain of custody certification against the LFCS. The standard explicitly mentions the scope of the certification and refers specifically to the scheme's CoC standard (LFCS ST 2002:201X) and forest management standard (LFCS ST 1002:2013).

The preconditions for certification bodies to become a PEFC Luxembourg notified certification body are comprehensively elaborated in the LFCS procedural document LF PD 1004. First of all certification bodies must be accredited by a national accreditation body that is again a member of the International Accreditation Forum (IAF). Certification bodies must also demonstrate sufficient technical knowledge (e.g. silvicultural knowhow, but also social and environmental knowhow) and must comply with the juridical requirements. If all preconditions are met, a certification body can apply for PEFC notification. When approved, a notification contract is signed between PEFC Luxembourg and the certifying body. Such a notification contract must ensure proper administration of the PEFC scheme, recognition of the certification body by PEFC Luxembourg and the recognized PEFC certification.

The standard uses clear referencing to ISO standards which makes the standard more comprehensive and mandatory. References are being made to ISO 17021:2011 (Requirements for bodies providing audit and certification of management systems) and ISO 17065:2012 (Conformity assessment – Requirements for bodies certifying products, processes and services). The contract obligations for both the certification bodies and PEFC Luxembourg are described in detail as well as the conditions for termination of the contract. The notification process seems open and democratic: No discriminatory elements have been found in the standard nor in other documentation although no clear statement is made wherein PEFC Luxembourg distances itself from discriminatory aspects.

The LFCS PD 1004 conforms to all PEFC criteria (chapter 5 of PEFC GD 1004:2009). As such the consultant has concluded that the LFCS PD 1004 conforms to the PEFC Council requirements regarding the notification of certification bodies.

### Observations on communication errors and typos:

Typo: FCS PD PD 1004 p 8, appendix 3: II. Informations et **docuemnts** pour la certification de la gestion de forêt.

## 10. PROCEDURES FOR ISSUANCE OF LOGO LICENSING

The PEFC logo/label provides information relating to the origin of forest based product of sustainable managed forest, recycled- and other non-controversial sources. Purchasers can use this information by choosing a product based on environmental- or other considerations. The PEFC Logo is a registered trademark owned by the PEFC Council. PEFC Luxembourg requires that the PEFC Logo can only be used based on a valid logo license that is issued by PEFC Luxembourg (which is the PEFC authorized body in the Grand Duchy of Luxembourg). The issuance of a PEFC logo by PEFC Luxembourg is carried out on the condition that a valid contract exists between PEFC Luxembourg and the PEFC Council.

The requirements of the LFCS concerning qualification for PEFC logo licensing are documented in two LFCS documents:

- PEFC - LFCS ST 2001:2008 (PEFC Logo usage rules) (fully adopted by PEFC Luxembourg on 31 July 2013).
- LFCS PD 1003:2013 (Issuance of PEFC Logo licenses).

PEFC logo's are only issued for entities that are registered in the Grand Duchy of Luxembourg.

Three distinct user groups are defined for issuance of PEFC logo license:

- User group B: Forest Owners / managers
- User group C: Forest related industries
- User group D: Other users

PEFC Luxembourg has defined specific conditions on issuance of CoC logo license in case of a multi-site CoC and multi-site cross-country-CoC. Entities with a multi-site CoC certificate and a central office in the Grand Duchy of Luxembourg can apply for a multi-site license that covers the whole or a part of the scope of the multi-site certification. Preconditions are that the both the central office and the separate sites (e.g. entity departments) are a single legal entity and that both the central office and the sites are part of a single company with a single management and organisation structure. In that case the CoC certificate must be issued by a certification body that is notified by PEFC Luxembourg. For entities that are covered by a multi-site cross-country CoC certificate with a central office located outside the Grand Duchy of Luxembourg, the CoC certificate must be issued by a certification body that is notified by the respective PEFC authorized national body of the country where the central office is located.

The logo use contract between PEFC Luxembourg and the logo user (see LFCS PD 1003:2013: Appendix 1) is subject to a fee to be paid by the logo user. After the payment, the contract is formally established. The logo usage contract covers the following aspects (Articles): responsibilities of both PEFC Luxembourg and the logo user, conditions on contract termination, reporting and public presentation of the logo user id. data, validity of the contract and other terms. The conditions for contract termination (Article 6) are elaborate and well defined. In the opinion of the consultant, the logo user contract is solid and covers all important aspects of a contract arrangement.

The LFCS standard on the issuance of logo licenses (LFCS PD 1003) complies with all criteria of chapter 6 of PEFC GD 1004:2009. Hence, the consultant has concluded that the LFCS PD 1003 conforms to the PEFC Council requirements.

## 11. CERTIFICATION AND ACCREDITATION ARRANGEMENTS

Four LFCS documents are relevant in relation to the requirements concerning the qualifications of certification bodies and auditors:

- LFCS PD 1003: Issuance of PEFC logo licenses in Luxembourg
- LFCS ST 1004:2013: Requirements for bodies providing audit and certification of SFM
- LFCS PD 1004:2013: Notification procedure of certification bodies
- PEFC - LFCS ST 2003:2012: Requirements for bodies providing audit & certification of CoC

In the table below, the relevant ISO normative documents are listed that are used as normative documents in above mentioned LFCS documentation (with exception of the fully adopted PEFC - LFCS ST 2003:2012):

		LFCS PD 1003	LFCS ST 1004:2013	LFCS PD 1004:2013
ISO Standard	Coverage of ISO standard			
ISO/IEC 17021:2011	Requirements for bodies providing audit and certification of management systems		X	X
ISO/IEC 17011:2004	General requirements for accreditation bodies accrediting conformity assessment bodies		X	
ISO 17065:2012	Requirements for bodies certifying products, processes and services			X
ISO/IEC 19011:2011	Additional guidance for the auditing of management systems		X	X

LFCS documentation (see above) is comprehensive. Most of the PEFC requirements are covered by the LFCS documents. PEFC requirements that are not covered by the LFCS documentation are covered by relevant normative ISO standards (see table above) which are decisive in the LFCS. The referencing to these ISO standards provides full compliance of the LFCS with the PEFC requirements. On some aspects, the LFCS scheme documentation is even more elaborate than needed with respect to the PEFC requirements. For example, the LFCS includes additional requirements on certification procedures, mentioned in chapter 8 and 9 of LFCS ST 1004.

PEFC Luxembourg has decided to change from ISO 17065 to ISO 17021 (as also requested in PEFC ST 1004:201x, enquiry draft). This requires the accreditation body to develop a new accreditation program based on ISO 17021. Since the PEFC Luxembourg's group certificate is strongly aligned with the PEFC German forest certification scheme (see PEFC Luxembourg checklist) it has been decided to align the transition period with the changes in the PEFC German forest certification scheme. As a result the transition date of LFCS ST 1004:2013 (Requirements for bodies providing audit and certification of SFM) is two years instead of one, which is possible in exceptional circumstances, according to the PEFC requirements.

No non-conformities have been found by the consultant on the certification and accreditation procedures of the LFCS. As such the consultant has concluded that the LFCS conforms to the PEFC Council requirements regarding the certification and accreditation arrangements.

## 12. COMPLAINTS AND DISPUTE RESOLUTION PROCEDURES

The complaints and dispute resolution procedures of the LFCS are documented in the LFCS PD 1002:2013 (Procedures for investigation and resolution of complaints and appeals). This document conforms to all criteria of chapter 8 of PEFC GD 1004:2009.

The complaint/appeal procedures as stated in LFCS PD 1002:2013 can be summarized as follows:

1. The complain/appeal will be sent in writing to the PEFC Luxembourg's Secretariat.
2. The complain will be formally accepted or not.
3. When the complaint or appeal is accepted, PEFC Luxembourg's Chairman shall assign an ad-hoc Task Force Group (the TFG), to investigate the complaint or appeal.
4. The members of the TFG shall have no vested or conflict of interest in the complaint or appeal. Alternatively, in justifiable circumstances, the TFG may have balanced representation of concerned parties.
5. The TFG shall investigate the complaint and provide a written report whether, or not, the complaint or appeal has been substantiated and recommendations on resolving the complaint/appeal.
6. The BoD shall approve or reject the conclusions of the report, including its recommendations or remedial actions.
7. Where the complaint or appeal concerns the decision of the GA, the final decision is made by the General Assembly based on recommendation of the BoD.

LFCS PD 1002:2013 complies with all criteria of chapter 8 of PEFC GD 1004:2009. Hence, the consultant has concluded that the LFCS document conforms to the PEFC Council requirements regarding the complaints and dispute resolution procedures.



## 13. ANNEXES

### Annex A: PEFC Standard Requirements Checklist

#### Purpose

The PEFC Standard Requirement Checklist was used by the assessment team to identify compliances and non-compliances of the revised LFCS scheme documents with the requirements of the PEFC.

#### Methodology of Indication of conformities and non-conformities

The results of the assessments are shown in the column '*Reference to application documents*' of the standard requirement checklist and a definitive statement regarding its conformity with the PEFC requirements is made in the column 'YES/NO'. When the LFCS Standard Documents were found to be fully compliant with the relevant PEFC requirements, the requirement was indicated with a 'YES'. Also in that case, the statement '**Conforms**' is written in the column '*Reference to application documents*'. When the text of the LFCS standard documents is an exact or accurate copy of the text in the PEFC standards no extra comments were provided.

In the case of a non-conformity, the consultant marked the column 'YES/NO' with a 'NO'. A 'NO' means that a part of the PEFC requirements has not been met and that the requirement is a non-conformity. Taking into account the feedback of the PoE's, the non-conformity was indicated as a 'minor' or 'major' non-conformity. Subsequently, in the case of a non-conformity, a **non-conform** statement is made in the column '*Reference to application documents*', together with a clear argumentation why the criteria was assessed as non-conform.

#### References, citations and description of non-conformities and observations

The references to the respective LFCS standard documents and chapters are given at the beginning of the relevant section (e.g. 'LFCS PD 1001:2013, p4, chapter 1.1'). To clarify the conformity or non-conformity citations from the standard documents are copied into the checklists to demonstrate compliance. Citations are marked with quotation marks ("....."). In cases formulation was done in the consultants' own wording (e.g. by interpreting the content of the provided documented information), the text is written without quotation marks. In cases where the feedback from the stakeholder survey is used, an explicit reference is made to the stakeholder survey.

#### Legend for column YES/NO:

YES = Assessment showed compliance with the PEFC International Benchmark Standards

NO = Non-conformity with the PEFC International Benchmark Standards

N/A = Not applicable

## 14. PART I: STANDARD AND SYSTEM REQUIREMENT CHECKLIST FOR STANDARD SETTING (PEFC ST 1001:2010)

### 14.1 Scope

Part I covers the requirements for standard setting defined in PEFC ST 1001:2010, *Standard Setting – Requirements*.

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

### 14.2 Checklist

Question	Assess. basis*	YES/NO	Reference to application documents
<b>Standardising Body</b>			
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	<p>LFCS PD 1001: 5.4 Technical Committee stage LFCS PD 1001: p7, 4.1.1 "<i>The PEFC Luxembourg's General Assembly shall be responsible for the formal 4.2 PEFC Luxembourg's Board of Directors 4.2.1 The Board of Directors' responsibilities within the standard setting process shall be:</i></p> <p><i>a) Approval of the project proposal;</i></p> <p><i>b) Establishment and dissolution of the Technical Committee;</i></p> <p><i>c) Recommendation of the Final draft standards for formal approval by the General Assembly."</i></p> <p>LFCS PD 1001: p7, 4.2.2 "<i>The composition and decision making mechanisms of the Board of Directors is defined in the PEFC Luxembourg's Statutes."</i></p> <p>Approval of the LFCS standards. LFCS PD 1001: p15, 5.6.1.2 "<i>The composition and decision making of the General Assembly is defined in the PEFC Luxembourg's Statutes. "</i></p>

			<p>LFCS PD 1001: p7, 4.3 <i>“PEFC Luxembourg’s Secretariat 4.3.1 The Secretariat shall be responsible, inter alia, for the implementation of the standard setting procedures. For this purpose, the Secretariat arranges all contacts between the Technical Committee, and the Board of Directors. In particular, the Secretariat shall be responsible for:</i></p> <ul style="list-style-type: none"> <li><i>a) Preparation of the standard setting and project proposal;</i></li> <li><i>b) Preparation of the working draft and consequent drafts of documents;</i></li> <li><i>c) Providing secretarial and administration support to the Technical Committee;</i></li> <li><i>d) Announcing the start of the standard setting process;</i></li> <li><i>e) Administration of the public and members consultations;</i></li> <li><i>f) Records keeping.</i></li> </ul> <p><i>4.3.2 The Board of Directors shall appoint a project leader who is responsible for the Secretariat’s activities.”</i></p> <p>The standardising body PEFC Luxembourg, has entities responsible for consensus building and for formal adoption of the standard.</p> <p><b>Conforms</b></p>
<p>b) the record-keeping procedures,</p>	<p>Procedures</p>	<p>YES</p>	<p>LFCS PD 1001: 9 <i>“Records on the development process</i></p> <p><i>9.1 The following records of the standard setting process shall be prepared and maintained by the Secretariat:</i></p> <ul style="list-style-type: none"> <li><i>a) Minutes of the Board of Directors meetings;</i></li> <li><i>b) Minutes of the Technical Committee meetings, including comments of its members and their consideration, results of the consensus building and resolution of oppositions;</i></li> <li><i>c) Minutes of the General Assembly meetings;</i></li> <li><i>d) Comments from public consultation and results of their consideration;</i></li> <li><i>e) Pilot testing;</i></li> <li><i>f) Complaints and their resolutions.</i></li> </ul> <p><i>9.1 The records shall be kept for a minimum of five years and shall be available to interested parties upon request.”</i></p> <p>Procedures for record keeping are in place, although no requirements about the content are described.</p>

			<b>Conforms</b>
c) the procedures for balanced representation of stakeholders,	Procedures	YES	<p>LFCS PD 1001, p8, 4.5.2 <i>“The Technical Committee composition provides for balanced representation of stakeholders with the aim of building consensus amongst participating interested stakeholders. No single concerned interest shall be allowed to dominate the process nor to be dominated. The Technical Committee consists of maximum of 12 members with 4 representatives representing each of the following stakeholder categories:</i></p> <p><i>a) Primary producers including forest owners and managers;</i></p> <p><i>b) Processors, including forest related industries;</i></p> <p><i>c) Forest users, including environmental organisations, trade unions, research and academic organisations, hunting associations, hikers, tourism organisations, etc.;”</i></p> <p>LFCS PD 1001 5.3.1 <i>“Stakeholders mapping 5.3.1.1 The Secretariat shall carry out a stakeholder mapping with the aim of identification of stakeholders relevant to the standard setting, their needs as well as constraints of their participation.</i></p> <p><i>5.3.1.2 The stakeholder mapping shall identify disadvantaged and key stakeholders and actions addressing the constraints of their participation. Note: The constraints relating to the standard setting may include language barriers, resources limitations, etc.”</i></p> <p><b>Conforms</b></p>
d) the standard-setting process,	Procedures	YES	<p>LFCS PD 1001, p9, 5 Standard setting process.</p> <p>Proposal stage &gt; (Project development, Project approval) -&gt; Preparatory stage: ( Stakeholders mapping, Public announcement, Invitation to PEFC members and interested stakeholders, Technical Committee establishment, Development of a working draft) -&gt; Technical Committee stage: ( Consideration of comments, Consensus building) -&gt; Enquiry stage (Public consultation) -&gt; Pilot testing (not required for revisions) -&gt;Approval stage (Development report, General Assembly approval) -&gt; Publication stage</p> <p><b>Conforms</b></p>
e) the mechanism for reaching consensus, and	Procedures	YES	<p>LFDS PD 1001, p12, 5.4.1 <i>“Consideration of comments 5.4.1.1 The Technical Committee stage shall be the principal stage at which comments from interested stakeholders are taken into consideration, with a view to achieving consensus on the content of the draft document(s)”</i></p> <p>LFDS PD 1001, p13, 5.4.2 <i>“Consensus building</i></p> <p><i>5.4.2.1 The decision of the Technical Committee to recommend a Final draft for a formal</i></p>

			<p>approval (see 5.6) shall be taken on the basis of the consensus principle and in compliance with chapter 4.5.6.</p> <p>5.4.2.2 In order to reach consensus the Technical Committee can utilise the following alternative processes to establish whether or not there is opposition to the Final draft:</p> <p>a) a face-to face meeting where there is a verbal YES/no vote, show of hands for a YES/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,</p> <p>b) a telephone conference meeting where there is a verbal YES/no vote,</p> <p>c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or</p> <p>d) Combination thereof.</p> <p>5.4.2.3 In any case of a negative vote which represents sustained opposition of any important part of the concerned interests to a substantive issue, the issue shall be resolved using the following mechanism:</p> <p>a) Discussion and negotiation on the disputed issue within the Technical Committee in order to find a compromise;</p> <p>b) Direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different view on the disputed issue in order to find a compromise;</p> <p>c) Dispute resolution process.</p> <p>Note 2 The dispute resolution process shall be governed by LFCS PD 1002.”</p> <p>The mechanism for reaching consensus is present. <b>Conforms</b></p>
f) revision of standards/normative documents.	Procedures	YES	<p>LFCS PD 1001, p17, 7 Revision of the LFCS standards <b>Conforms</b></p>
4.2 The standardising body shall make its standard-setting procedures publicly available and shall regularly review its standard-setting	Procedures	YES	<p>LFDS PD 1001, p5, 1.2 This document shall be regularly reviewed and revised every five years or before each periodic revision of the LFCS standards taking into account comments from interested parties. The document is publicly available. <b>Conforms</b></p>
	Process	YES	<p>LFCS PD 1001:2013 is available on the website www.pefc.lu, also a special page is made</p>

<p>procedures including consideration of comments from stakeholders.</p>			<p>available in French and German: Revision 2013 des LFCS, On this page the following documents are made public: The standard setting report, the comments received, Form for the submission of comments, complaints and their resolutions, and the email address of M. Dostert (Project leader) to send the comments.</p> <p>The process of engaging the stakeholder is also described in the Standard Setting Report 2013-08-01, the related documents are presented by LFCS, the following activities demonstrate the efforts of LFCS to consider the comments from stakeholders.</p> <p>The Secretariat publicly announced the start of the revision on 6 February 2013 at its website, including a press release and invited all interested parties to (i) submit their nominations for the TC; to comment on (ii) the revision project proposal; and (iii) standard setting requirements LFCS PD 1001:2013. PEFC Luxembourg also presented the start of the revision process at the conference on implementation of European Timber Regulation in Luxembourg held on 7 February 2013. Following the stakeholders mapping, a direct invitation letter was sent out to all organisations in Luxembourg identified in the stakeholder mapping.</p> <p>During the public consultation period PEFC Luxembourg distributed by e-mail invitation to participate in the public consultation to the stakeholders identified by stakeholders mapping.</p> <p><b>Conforms</b></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>LFCS PD 1001, chapter 9. Records on the development process. 9.1 The following records of the standard setting process shall be prepared and maintained by the Secretariat:</p> <ul style="list-style-type: none"> <li>a) Minutes of the Board of Directors meetings;</li> <li>b) Minutes of the Technical Committee meetings, including comments of its members and their consideration, results of the consensus building and resolution of oppositions;</li> <li>c) Minutes of the General Assembly meetings;</li> <li>d) Comments from public consultation and results of their consideration;</li> <li>e) Pilot testing;</li> <li>f) Complaints and their resolutions.</li> </ul> <p>9.1 The records shall be kept for a minimum of five years and shall be available to interested parties upon request.</p> <p>PEFC Luxembourg has mandated extensive record keeping for all entities operating within PEFC Luxembourg (BoD, TC and GA). Also complains (and resolutions) will be recorded. Records must</p>

			<p>be kept for 5 years minimum. As such, the LFCS conforms to this PEFC criteria.</p> <p><b>Conforms</b></p>
	Process	YES	<p>PEFC Luxembourg Secretariat was responsible for keeping records. The following information was available.</p> <p>a) Minutes of the BoD Minutes of the BoD meeting on 2013-02-07 (de) Minutes of the BoD meeting on 2013-02-23 (de) Minutes of the BoD meeting on 2013-07-19</p> <p>b) Minutes of the Technical Committee Minutes of the TC meeting on 2013-03-11 (fr) Minutes of the TC meeting on 2013-04-30 (fr) Minutes of the TC meeting on 2013-06-03 (fr) Minutes of the TC meeting on 2013-07-08 (fr)</p> <p>c) Minutes of the GA Minutes of the GA meeting on 2013-07-31</p> <p>d) Comments from public consultation and results of their consideration. Comments from public consultation, 07-06-2013</p> <p>e) Pilot testing In LFCS PD 1001, there is a note, indicating that pilot testing is not needed with the standard revision.</p> <p>f) No complaints were received as a result of the standard setting procedure and process.</p> <p><b>Conforms</b></p>
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	Procedures	YES	<p>LFCS PD 1001, p7, 4 "<i>Organisational Structure and Responsibilities for Standard Setting LFCS PD 1001, 4.4 Technical Committee</i></p> <p>LFCS PD 1001, 4.5.1 "<i>A permanent Technical Committee shall be established and dissolved by the Board of Directors. The Technical Committee shall report to the Board of Directors.</i>"</p> <p><b>Conforms</b></p>
	Process	YES	<p>The PEFC Luxembourg Board of Directors approved 9 organization as member of The Technical Committee (2014-02-23), the option was kept open to welcome others on a later date.</p> <p>When looking at Annex 3 of the standard setting Report: a list of the TC members is presented, 11 organisations/companies can be differentiated, (sharing 9 votes, the term used in the report</p>

			<p>is Member organisation): (Reference to Annex: List TC members)</p> <p>In the Minute of the BoD (2014-02-23) 9 organisations are mentioned. It implies 2 organisations where added on a later date.</p> <p>In the Minute of the TC 2013-03-11, 10 organisations/companies are represented, sharing 9 votes, an email from REKA (Jean-Marc Bintner) asking to participate was received 2013-02-26. We have record of SEBES entering the TC on a later date: The question from them to participate was received 2013-03-19.</p> <p>Mr. Christian Schroeder (SEBES) was introduced 30-04-2014 as a new representative (Minutes TC, 2014-04-30). The Minute states: he will shares his vote with the Ministry of Agriculture.</p> <p><b>Conforms</b></p>
4.4 The working group/committee shall:			
a) be accessible to materially and directly affected stakeholders,	Procedures	YES	<p>LFCS PD 1001, 5.3.2 <i>"Public announcement 5.3.2.1 The Secretariat shall make a public announcement of the start of the standard setting process in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful participation."</i></p> <p>LFCS PD 1001, 4.5.2 <i>"The Technical Committee composition provides for balanced representation of stakeholders with the aim of building consensus amongst participating interested stakeholders. No single concerned interest shall be allowed to dominate the process nor to be dominated. The Technical Committee consists of maximum of 12 members with 4 representatives representing each of the following stakeholder categories:</i></p> <ul style="list-style-type: none"> <li><i>a) Primary producers including forest owners and managers;</i></li> <li><i>b) Processors, including forest related industries;</i></li> <li><i>c) Forest users, including environmental organisations, trade unions, research and academic organisations, hunting associations, hikers, tourism organisations, etc.;"</i> <p><b>Conforms</b></p> </li></ul>
	Process	YES	<p>LFCS PD 1001: 2013 is available on the website <a href="http://www.pefc.lu">www.pefc.lu</a>, also a special page is made available in French and German: Revision 2013 des LFCS, On this page the following documents are made public: The standard setting report, the comments received, Form for the submission</p>



			<p>of comments, complaints and their resolutions, and the email address of M. Dostert (Project Leader) to send the comments.</p> <p>The process of engaging the stakeholder is also described in the Standard setting Report 2013-08-01, the related documents are presented by LFCS, the following activities demonstrate the efforts of LFCS to consider the comments from stakeholders.</p> <p>The Secretariat publicly announced the start of the revision on 6 February 2013 at its website, including a press release and invited all interested parties to (i) submit their nominations for the TC; to comment on (ii) the revision project proposal; and (iii) standard setting requirements LFCS PD 1001:2013. PEFC Luxembourg also presented the start of the revision process at the conference on implementation of European Timber Regulation in Luxembourg held on 7 February 2013. Following the stakeholders mapping, a direct invitation letter was sent out to all organisations in Luxembourg identified in the stakeholder mapping.</p> <p><b>Conforms</b></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	<p>LFCS PD 1001, 4.5.2 The Technical Committee composition provides for balanced representation of stakeholders with the aim of building consensus amongst participating interested stakeholders. No single concerned interest shall be allowed to dominate the process nor to be dominated. The Technical Committee consists of maximum of 12 members with 4 representatives representing each of the following stakeholder categories:</p> <ul style="list-style-type: none"> <li>a) Primary producers including forest owners and managers;</li> <li>b) Processors, including forest related industries;</li> <li>c) Forest users, including environmental organisations, trade unions, research and academic organisations, hunting associations, hikers, tourism organisations, etc.;</li> </ul> <p><b>Conforms</b></p>
	Process	YES	<p>The Secretariat publicly announced the start of the revision on 6 February 2013 at its website, including a press release and invited all interested parties to submit their nominations for the TC;</p> <p>9 requests to participate were received before the first BoD meeting. The BoD method of grouping and the composition of the groups (which organisation is classified into which group) is not clear from the minutes provided by BoD, however in the Minutes of the TC the user groups and related voting are described and agreed upon.</p> <p>Minutes TC 2013-03-11, Votes are equally distributed among 3 user groups: Forest owners and</p>

			<p>managers, Processors, Forest users.  Each group contains 3 member organizations with one vote each. [Annex 3, Report Standard Process]  To be able to have only 9 votes divide over the different user groups: the 'Joint membership' was introduced. The companies: REKA and Kronospan shared one vote (Minutes TC 2013-03-11) and the ministry of Agriculture and SEBAS (Watermanagement) also shared one vote (Minutes TC 2013-04-30).  <b>Conforms</b></p>
<p>c) include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.</p>	Procedures	YES	<p>LFCS PD 1001, 4.5.2 <i>"The Technical Committee composition provides for balanced representation of stakeholders with the aim of building consensus amongst participating interested stakeholders. No single concerned interest shall be allowed to dominate the process nor to be dominated. The Technical Committee consists of maximum of 12 members with 4 representatives representing each of the following stakeholder categories:</i>  <i>a) Primary producers including forest owners and managers;</i>  <i>b) Processors, including forest related industries;</i>  <i>c) Forest users, including environmental organisations, trade unions, research and academic organisations, hunting associations, hikers, tourism organisations, etc.;"</i>  <b>Conforms</b></p>
	Process	YES	<p>Minutes TC 2013-03-11, Votes are equally distribute among 3 user groups:  1) Forest owners and managers,  2) Processors and  3) Forest users.  Each group contains 3 member organizations with one vote each. [Annex 3, Report Standard Process]  To be able to have only 9 votes divide over the different user groups: 'Joint membership' was introduced. The companies: REKA and Kronospan shared one vote (Minutes TC 2013-03-11) and the Ministry of Agriculture and SEBAS (Watermanagement) also shared one vote (Minutes TC 2013-04-30).  <b>Conforms</b></p>
<p>4.5 The standardising body shall establish procedures for dealing with any</p>	Procedures	YES	<p>LFCS PD 1001, p17, <i>"8 Appeals and complaints 8.1 Any substantive or procedural complaints or appeals and shall be resolved using the complaints and appeals resolution procedures outlined in LFCS PD 1002."</i></p>

substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders.			<p>LFCS PD 1002, p2, 1 Scope "1.1 This guideline details procedures for complaints and appeals to PEFC Luxembourg which concern decisions and/or activities related to PEFC Luxembourg, including standard setting"</p> <p>LFCS PD 1002, p3, "3 Definitions 3.1 Appeal Written request by any person or organization (the appellant) for reconsideration of any decision affecting the appellant made by PEFC Luxembourg's bodies where the appellant considers such decision have been taken in breach of the PEFC Luxembourg's requirements or procedures."</p> <p>Procedures are in place</p> <p><b>Conforms.</b></p>
	Process	YES	<p>No information available that the PEFC Luxembourg has received a complaint or appeal relating to its standard setting activities. In the stakeholder survey no respondent had an issue or disagreed with the processes during the latest Standard Setting Process.</p> <p><b>Conforms</b></p>
4.5 Upon receipt of the complaint, the standard-setting body shall:			
a) acknowledge receipt of the complaint to the complainant,	Procedures	YES	<p>LFCS PD 1002, p 4, 4.4 "The PEFC Luxembourg 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;"</p> <p><b>Conforms</b></p>
	Process	YES	<p>No information available that the PEFC Luxembourg has received a complaint or appeal relating to its standard setting activities. In the stakeholder survey no respondent had an issue or disagreed with the processes during the latest Standard Setting Process.</p> <p><b>Conforms</b></p>
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	<p>LFCS PD 1002, p 4, 5" Complaint and appeal resolution process</p> <p>5.1 The PEFC Luxembourg's Chairman shall assign an ad-hoc Task Force Group (the TFG), comprising one or more persons, to investigate the accepted complaint or appeal. The members of the TFG shall have no vested or conflict of interest in the complaint or appeal. Alternatively, in justified circumstances, the TFG may have balanced representation of concerned parties.</p> <p>5.2 The TFG shall undertake a thorough investigation and seek a resolution. The TFG shall submit in a timely matter, a detailed written report, to the PEFC Luxembourg's Chairman 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</p>

			<p><i>complaint/appeal.</i></p> <p><i>5.3 The Board of Directors shall approve or disapprove the conclusions of the report, including its recommendations or remedial actions. Where the complaint or appeal concerns the decision of the General Assembly, the final decision is made by the General Assembly based on recommendation of the Board of Directors."</i></p> <p><b>Conforms</b></p>
	Process	YES	<p>No information available that the PEFC Luxembourg has received a complaint or appeal relating to its standard setting activities. In the stakeholder survey no respondent had an issue or disagreed with the processes during the latest Standard Setting Process.</p> <p><b>Conforms</b></p>
c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	Procedures	YES	<p>LFCS PD 1002, p 4, 5.4 "<i>The PEFC Luxembourg'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.</i>"</p> <p><b>Conforms</b></p>
	Process	YES	<p>No information available that the PEFC Luxembourg has received a complaint or appeal relating to its standard setting activities. In the stakeholder survey no respondent had an issue or disagreed with the processes during the latest Standard Setting Process.</p> <p><b>Conforms</b></p>
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	<p>LFCS PD 1002, p3, 4.1 All complaints and appeals shall be addressed in writing to PEFC Luxembourg's Secretariat.</p> <p>The address of PEFC Luxembourg a.s.b.l. is available on the website. The Secretariat address is not specifically mentioned on the website, but this is the same address: (check: 25-01-2014) Source: <a href="http://www.pefc.lu/de/index.php?nr=11&amp;name=kontakt">http://www.pefc.lu/de/index.php?nr=11&amp;name=kontakt</a>.</p> <p>However on the contact page of the website three different addresses are presented: Groupement des Sylviculteurs a.s.b.l., PEFC Luxembourg a.s.b.l., Administration des Eaux et Forêts. But because a phone number and a form is made available on the website to ask for guidance, and the address of PEFC Luxembourg can be found on the first page of each PEFC Luxembourg standard the contact point can be considered easily available.</p> <p><b>Conforms</b></p>
<b>Standard-setting process</b>			

5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work	Procedures	YES	<p>LFCS PD 1001, p11, 5.3.1 <i>"Stakeholders mapping</i>  <i>5.3.1.1 The Secretariat shall carry out a identification of stakeholders relevant to the standard setting, their needs as well as constraints of their participation.</i>  <i>5.3.1.2 The stakeholder mapping shall identify disadvantaged and key stakeholders and actions addressing the constraints of their participation.</i>  <i>Note: The constraints relating to the standard setting may include language barriers, resources limitations, etc. "</i>  <b>Conforms</b></p>
	Process	YES	<p>The Secretariat carried out a stakeholders mapping exercise that resulted in a list of stakeholders relevant to the revision process. The names are provided in the document 4-3 Stakeholders mapping v02. There are 97 names/organizations mentioned in the Excel list. The documentation made clear that during the Standardisation process, the list is updated when contact information changed.  <b>Conforms</b></p>
5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.	Procedures	YES	<p>LFCS PD 1001, p11, "5.3.1 <i>Stakeholders mapping</i>  <i>5.3.1.2 The stakeholder mapping shall identify disadvantaged and key stakeholders and actions addressing the constraints of their participation.</i>  <i>Note: The constraints relating to the standard setting may include language barriers, resources limitations, etc."</i> A verb (vb take) is missing before the word actions, as now it is only identify and not seek participation. However, the consultant is of the opinion that this is only a minor issue and placing this in the context of the latest standard setting procedures, the overall high quality of LFCS and the process showing the participation seeking taking place. The LFCS is considered conforms to this requirement.  <b>Conforms</b></p>
	Process	YES	<p>The Secretariat carried out a stakeholders mapping exercise that resulted in a list of stakeholders relevant to the revision process. The names are provided in 4-3 Stakeholders mapping v02. There are 97 names/organizations mentioned in the Excel list. 19 key stakeholders where identified. No disadvantaged Stakeholders where mentioned. All Stakeholders (not only key-stakeholders) received a letter to ask if they would like to participate in the process. Although the Procedure states that action should only be identified, PEFC Luxembourg clearly implemented the actions identified.  <b>Conforms</b></p>

5.3 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions.	Procedures	YES	<p>LFCS PD 1001, p11, "5.3.2 Public announcement</p> <p>5.3.2.1 The Secretariat shall make a public announcement of the start of the standard setting process in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful participation. The announcement shall include:</p> <p>a) The project proposal (see 5.2.1)</p> <p>b) Information about opportunities for stakeholders to participate in the process;</p> <p>c) An invitation to comment on the scope and the standard-setting process; and</p> <p>d) Reference to publicly available standard-setting procedures.</p> <p>e) Invitation of stakeholders to nominate their representatives to the Technical Committee.</p> <p>5.3.2.2 The announcement described in 5.3.2.1 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 to them."</p> <p><b>Conforms</b></p>
	Process	YES	<p>a) b) c) d) The Secretariat publicly announced the start of the revision on 6 February 2013 at its website, including a press release and invited all interested parties to (i) submit their nominations for the TC; to comment on (ii) the revision project proposal; and (iii) standard setting requirements LFCS PD 1001:2013. PEFC Luxembourg also presented the start of the revision process at the conference on implementation of European Timber Regulation in Luxembourg held on 7 February 2013.</p> <p>e) The Secretariat carried out a stakeholders mapping exercise that resulted in a list of stakeholders relevant to the revision process. The names are provided in 4-3 Stakeholders mapping v02. According to document "7-5 Invitation_stakeholders 20130207" all stakeholders received an invitation to participate.</p> <p><b>Conforms</b></p>
5.3 The announcement and invitation shall include:			
a) information about the objectives, scope and the steps of the standard-	Procedures	YES	<p>LFCS PD 1001, p11, 5.3.2.1 "The announcement shall include: a) The project proposal (see 5.2.1)"</p> <p>LFCS PD 1001, p11, 5.2.2 "The project proposal shall cover the following issues:</p>

<p>setting process and its timetable,</p>			<p>a) Objectives and scope of the standard setting (development of a new document or a new part or revision of an existing document);  b) Proposal for a project leader;  c) Description of the standard setting stages and expected timetable"  <b>Conforms</b></p>
<p>b) information about opportunities for stakeholders to participate in the process,</p>	<p>Process</p>	<p>YES</p>	<p>The project proposal document: "4-1 Revision project approved 2013-02-06 EN" contains a) Chapter 2, p2: Objectives and Scope b) Project leader M. Dostert en c) Chapter 4 Revision stages and timetable and Chapter 5, p6 contains the Revision timetable  <b>Conforms</b></p>
<p>b) information about opportunities for stakeholders to participate in the process,</p>	<p>Procedures</p>	<p>YES</p>	<p>LFCS PD 1001, p12 5.3.2 "<i>Public announcement 5.3.2.1 The Secretariat shall make a public announcement of the start of the standard setting process in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful participation. The announcement shall include:</i>  a) <i>The project proposal (see 5.2.1);</i>  b) <i>Information about opportunities for stakeholders to participate in the process;</i>  c) <i>An invitation to comment on the scope and the standard-setting process; and</i>  d) <i>Reference to publicly available standard-setting procedures.</i>  e) <i>Invitation of stakeholders to nominate their representatives to the Technical Committee."</i>  <b>Conforms</b></p>
<p>(c) an invitation to</p>	<p>Process</p>	<p>YES</p>	<p>See a) b) c) d) above. The Secretariat publicly announced the start of the revision on 6 February 2013 at its website, including a press release and invited all interested parties to (i) submit their nominations for the TC; to comment on (ii) the revision project proposal; and (iii) standard setting requirements LFCS PD 1001:2013. PEFC Luxembourg also presented the start of the revision process at the conference on implementation of European Timber Regulation in Luxembourg held on 7 February 2013.  Regarding e): The Secretariat carried out a stakeholders mapping exercise that resulted in a list of stakeholders relevant to the revision process.  The names are provided in reference document "4-3 Stakeholders mapping v02". According to reference document "7-5 Invitation stakeholders 20130207", all stakeholders received an invitation to participate.  <b>Conforms</b></p>
<p>(c) an invitation to</p>	<p>Procedures</p>	<p>YES</p>	<p>LFCS PD 1001, p12 5.3.2 "<i>Public announcement 5.3.2.1 The Secretariat shall make a public</i></p>

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><i>announcement of the start of the standard setting process ... The announcement shall include:</i></p> <p><i>b) Information about opportunities for stakeholders to participate in the process;</i></p> <p><i>c) An invitation to comment on the scope and the standard-setting process; and</i></p> <p><i>d) Reference to publicly available standard-setting procedures.</i></p> <p><i>e) Invitation of stakeholders to nominate their representatives to the Technical Committee.</i></p> <p><i>5.3.2.2 The announcement described in 5.3.2.1 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 to them."</i></p> <p><b>Conforms</b></p>
	Process	YES	<p>The Secretariat carried out a stakeholders mapping exercise that resulted in a list of stakeholders relevant to the revision process. The names are provided in 4-3 Stakeholders mapping v02. According to document "7-5 Invitation_stakeholders 20130207" all stakeholders received an invitation to participate.</p> <p>All stakeholders received a letter with a form they could submit if they would like to participate.</p> <p><b>Conforms</b></p>
d) an invitation to comment on the scope and the standard- setting process, and	Procedures	YES	<p>LFCS PD 1001, p12 5.3.2 "<i>Public announcement</i></p> <p><i>5.3.2.1 The Secretariat shall make a public announcement of the start of the standard setting process ... The announcement shall include:</i></p> <p><i>c) An invitation to comment on the scope and the standard-setting process; and"</i></p> <p><b>Conforms</b></p>
	Process	YES	<p>LFCS PD 1001: 2013 is available on the website <a href="http://www.pefc.lu">www.pefc.lu</a>, also a specific page is made available in French and German: Revision 2013 des LFCS, On this page the following documents are made public: The standard setting report, the comments received, Form for the submission of comments, complaints and their resolutions, and the email address of M. Dostert to send the comments.</p> <p><b>Conforms</b></p>
e) reference to publicly available standard-setting procedures.	Procedures	YES	<p>LFCS PD 1001, p12 5.3.2 "<i>Public announcement</i></p> <p><i>5.3.2.1 The Secretariat shall make a public announcement of the start of the standard setting process. The announcement shall include:</i></p> <p><i>d) Reference to publicly available standard-setting procedures."</i></p> <p><b>Conforms</b></p>
	Process	YES	<p>LFCS PD 1001: 2013 is available on the website <a href="http://www.pefc.lu">www.pefc.lu</a>. Also a specific webpage is made</p>



			<p>available in French and German: Revision 2013 des LFCS. On this webpage the following documents are made public: The standard setting report (see Standard setting Report 2013-08-01), the comments received, a form for the submission of comments, an overview of complaints and their resolutions, and the email address of the PEFC Luxembourg Secretary (Mr. M. Dostert) to send the comments.</p> <p>The process of engaging the stakeholder is described in the Standard Setting Report (see reference Standard setting report 2013-08-01). The concerned LFCS documents (to be revised) are presented in this report as well as all activities that were carried out for the Standard Setting process (in chronological order). According to this report the Secretariat publicly announced the start of the revision on 6 February 2013 at its website, including a press release and invited all interested parties to (i) submit their nominations for the TC; to comment on (ii) the revision project proposal; and (iii) standard setting requirements LFCS PD 1001:2013. PEFC Luxembourg also presented the start of the revision process at the conference on implementation of European Timber Regulation in Luxembourg held on 7 February 2013.</p> <p><b>Conforms</b></p>
<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. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the</p>	<p>Procedures</p>	<p>YES</p>	<p>LFCS PD 1001, p11, 5.2.3 "<i>The Board of Directors reviews the revision process defined in the project proposal based on comments received from the stakeholders (5.3.2.1 c).</i>"</p> <p>LFCS PD 1001, p12 5.3.2 "<i>Public announcement 5.3.2.1 The Secretariat shall make a public announcement of the start of the standard setting process ... The announcement shall include:</i></p> <p><i>b) Information about opportunities for stakeholders to participate in the process;</i></p> <p><i>c) An invitation to comment on the scope and the standard-setting process; and</i></p> <p>LFCS PD 1001, p12, 5.4.1 <i>Consideration of comments</i></p> <p><i>5.4.1.1 The Technical Committee stage shall be the principal stage at which comments from interested stakeholders are taken into consideration, with a view to achieving consensus on the content of the draft document(s).</i>"</p> <p>LFCS PD 1001, p12, 5.3.3.1 <i>The Board of Directors shall decide on the acceptance of the nominations for membership of the Technical Committee following chapter 4.5.2. LFCS PD 1001, p8, 4.5.2 The Technical Committee composition provides for balanced representation of stakeholders with the aim</i></p>

working group/committee and resources available for the standard-setting.			<p><i>of building consensus amongst participating interested stakeholders. No single concerned interest shall be allowed to dominate the process nor to be dominated. The Technical Committee consists of maximum of 12 members with 4 representatives representing each of the following stakeholder categories:</i></p> <p><i>a) Primary producers including forest owners and managers;</i></p> <p><i>b) Processors, including forest related industries;</i></p> <p><i>c) Forest users, including environmental organisations, trade unions, research and academic organisations, hunting associations, hikers, tourism organisations, etc.;</i></p> <p><b>Conforms</b></p>
	Process	YES	<p>No mention or comments were received from the public as a result of the announcement. The PEFC Luxembourg Board of Directors approved all 9 organization which applied to participate as member of the Technical Committee (2014-02-23), with the option kept open to welcome others on a later date.</p> <p>In the Minute of the BoD (2014-02-23) only 9 organisations are mentioned. It implies 2 organisations where added on a later date.</p> <p>In the Minute of the TC 2013-03-11, already 10 organisations/companies are represented, sharing 9 votes (joint membership). (REKA shares a vote with Kronospan)</p> <p>PEFC Luxembourg provided records of SEBES entering the TC on a later date: Mr. Christian Schroeder (SEBES) was introduced 30-04-2014 as a new representative, (Minutes TC, 2014-04-30) The Minute states: he shares his vote with the Ministry of Agriculture.</p> <p>The sharing of the votes made in the TC by the 3 user groups, implies that a user group gets the same amount of 3 votes.</p> <p><b>Conforms</b></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	<p>LFCS PD 1001, p12, 5.4.1.2 "<i>The draft documents shall be available to all members of the Technical Committee in advance of its meetings.</i>"</p> <p><b>Conforms</b></p>
	Process	YES	<p>In the email invitation to the TC meetings, Reports are attached or the e-mail referred to the draft documents published at the PEFC Luxembourg's website.</p>

			In the stakeholder survey everyone of the TC confirmed they received all the information needed. <b>Conforms</b>
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	LFCS PD 1001, p12, 5.4.1.2 " <i>The draft documents shall be available to all members of the Technical Committee in advance of its meetings.</i> " LFCS PD 1001, p13, 5.4.1.3 " <i>Comments and views presented by any member of the Technical Committee shall be considered in an open and transparent way and their resolution and proposed changes to the draft documents shall be recorded.</i> " <b>Conforms</b>
	Process	YES	The Technical Committee has met four times. Everyone of the members received invitations to all meetings. During the meeting all members had the opportunity to contribute to the standards development and submit comments to the draft standards. When asked in the stakeholder survey if all interested parties were given the possibility to participate and contribute equally to the scheme development and revision most people answered YES, only one person indicated that this was partly the case, no example was given why this was not the case. <b>Conforms</b>
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	LFCS PD 1001, p13, 5.4.1.3 " <i>Comments and views presented by any member of the Technical Committee shall be considered in an open and transparent way and their resolution and proposed changes to the draft documents shall be recorded.</i> " <b>Conforms</b>
	Process	YES	Comments of the Technical Committee are available in the Minutes of the TC, they are discussed and voted on. In the stakeholder survey all respondents answered in the positive on the question if comments were received by the working group/committee and considered in an objective manner. <b>Conforms</b>
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	Procedures	YES	LFCS PD 1001, p14, 5.5.2.1 " <i>The invitation to the public consultation, including its start and end, shall be made in timely matter through suitable media, e.g. website, E-mail distribution, etc.).</i> "

manner in suitable media,			<b>Conforms</b>
	Process	YES	The public consultation was announced on the website: www.pefc.lu, and was also announced at the website of FSHCL, privatbesch.lu, wort newspaper, www.lieler.net and a press release was made available the 6 <sup>th</sup> of May. The end date was stated: 5th of July 2013. <b>Conforms</b>
b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable,	Procedures	YES	LFCS PD 1001, p14, 5.5.2.3 <i>"The invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable. The Secretariat should provide disadvantaged and key stakeholders with necessary assistance addressing their constraints for participation in the public consultation"</i> . <b>Conforms</b>
	Process	YES	PEFC Luxembourg distributed an invitation to participate in the public consultation to all stakeholders identified by the stakeholders mapping. The invitation included contact details to the PEFC Luxembourg Secretariat to request any assistance or clarifications. According to the PEFC Luxembourg in the document: PEFC Luxembourg's responses to the draft report prepared by ForestSense: PEFC Luxembourg has not received any request for assistance or clarifications. <b>Conforms</b>
c) the enquiry draft is publicly available and accessible,	Procedures	YES	LFCS PD 1001, p14, 5.5.1.1 <i>"The Enquiry draft shall be made available through the PEFC Luxembourg a.s.b.l. website and upon request by other appropriate means to interested stakeholders and the public for a 60 day public consultation."</i> LFCS PD 1001, p14, 5.5.2.4 <i>"The public consultation should be supported by actions such as a seminar or an article in suitable media aimed at introducing the Enquiry draft and encouraging the submission of comments."</i> <b>Conforms</b>
	Process	YES	The enquiry draft was available on the website: www.pefc.lu, and was also announced at the website of FSHCL, privatbesch.lu, wort newspaper, www.lieler.net and a press release was made available <b>Conforms</b>

d) the public consultation is for at least 60 days,	Procedures	YES	LFCS PD 1001, p14, 5.5.1.1 " <i>The Enquiry draft shall be made available through the PEFC Luxembourg a.s.b.l. website and upon request by other appropriate means to interested stakeholders and the public for a 60 day public consultation.</i> " <b>Conforms</b>
	Process	YES	The Public consultation took place from 6 May 2013 until 5 July 2013. <b>Conforms</b>
e) all comments received are considered by the working group/committee in an objective manner,	Procedures	YES	LFCS PD 1001, p14, 5.5.2.5 " <i>The received comments and views shall be considered by Technical Committee in an open and transparent way and these comments as well as results of their consideration shall be made publicly available in a timely manner through the LFCS website or upon request.</i> " <b>Conforms</b>
	Process	YES	The Technical Committee considered all comments received during the public consultation (Minutes TC 2013-07-08). The results of the consideration are also reported in the comments table for the public consultation. <b>Conforms</b>
(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	LFCS PD 1001, p14, 5.5.2.5 " <i>The received comments and views shall be considered by Technical Committee in an open and transparent way and these comments as well as results of their consideration shall be made publicly available in a timely manner through the LFCS website or upon request.</i> " <b>Conforms</b>
	Process	YES	LFCS PD 1001:2013 is available on the website <a href="http://www.pefc.lu">www.pefc.lu</a> , also a special page is made available in French and German: Revision 2013 des LFCS, On this page the following documents are made public: The standard setting report, the comments received, Form for the submission of comments, complaints and their resolutions, and the email address of M. Dostert to send the comments. The revised scheme documentation is published at the PEFC Luxembourg's website, on the 1st of August 2013. <b>Conforms</b>
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot	Procedures	YES	LFCS PD 1001, p14, 5.5.2 " <i>Pilot testing 5.3.1 The Enquiry draft of a new standard shall be tested through a pilot project and the results of the pilot testing shall be considered by the Technical Committee. Note: Pilot testing is not required in case of revision of a standard where experience from its usage can substitute for the pilot testing.</i> "

testing shall be considered by the working group/committee.			<b>Conforms</b>
	Process	N/A	Pilot testing is not required, as stated in the Note: Revision of a standard. <b>Conforms</b>
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	LFCS PD 1001, p13, 5.4.2.1 <i>"The decision of the Technical Committee to recommend a Final draft for a formal approval (see 5.6) shall be taken on the basis of the consensus principle and in compliance with chapter 4.5.6., 4.5.6: Final draft by a two thirds majority (2/3) plus one."</i> <b>Conforms</b>
	Process	YES	At the TC there are 9 votes divided over the different user groups. The total number of 7 (= 2/3 + 1, according to LFCS PD 1001, p9, 4.5.6) votes is needed to approve the standards: The companies: REKA and Kronospan shared one vote (Minutes TC 2013-03-11) and the ministry of Agriculture and SEBAS (Watermanagement) also shared one vote (Minutes TC 2013-04-30). During the meeting of 2013-07-08 4 votes were counted. Written votes were requested from all members of the TC not present at the meeting. <b>Conforms</b>
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	LFCS PD 1001, p 13, <i>"5.4.2.2 In order to reach consensus the Technical Committee can utilise the following alternative processes to establish whether or not there is opposition to the Final draft: 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.,"</i> <b>Conforms</b>
	Process	N/A	see d)
b) a telephone conference meeting where there is a verbal YES/no vote,	Procedures	YES	LFCS PD 1001, p 13, 5.4.2.2 <i>"In order to reach consensus the Technical Committee can utilise the following alternative processes to establish whether or not there is opposition to the Final draft: b) a telephone conference meeting where there is a verbal YES/no vote,"</i> <b>Conforms</b>
	Process	N/A	No Telephone conference meeting was conducted during the process

<p>c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or</p>	<p>Procedures</p>	<p>YES</p>	<p>LFCS PD 1001, p 13, 5.4.2.2 <i>"In order to reach consensus the Technical Committee can utilise the following alternative processes to establish whether or not there is opposition to the Final draft: 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"</i> <b>Conforms</b></p>
	<p>Process</p>	<p>N/A</p>	<p>No e-mail meeting was conducted during the process</p>
<p>d) combinations thereof.</p>	<p>Procedures</p>	<p>YES</p>	<p>LFCS PD 1001, p 13, 5.4.2.2 <i>"In order to reach consensus the Technical Committee can utilise the following alternative processes to establish whether or not there is opposition to the Final draft: d) Combination thereof"</i> <b>Conforms</b></p>
	<p>Process</p>	<p>YES</p>	<p>LFCS PD 1001, p 13, 5.4.2.1 <i>"The decision of the Technical Committee to recommend a Final draft for a formal approval (see 5.6) shall be taken on the basis of the consensus principle and in compliance with chapter 4.5.6., 4.5.6: Final draft by a two thirds majority (2/3) plus one."</i> During the TC meeting of 2013-07-08 4 votes were counted. Written votes were requested from all members of the TC not present at the meeting.</p> <p>As well as the meeting votes, Reka and Kronospan sent a postal ballot to approve the standards. The other voting organisations with "joint membership" are the Ministry of Agriculture and SEBES. A written vote from SEBES is present, but no vote from the Ministry of Agriculture and no representative was at the meeting of 2013-07-08. There was not a clear procedure in place on how to act when two organisations share one vote and one of these organisations did not express their vote. It can be considered that the other (not voting) does not have an objection against any kind of decision and the positive vote of one member in "joint membership" can be counted as a positive vote.</p> <p>In the stakeholder survey none of the respondents had a disagreement on any issue concerning the Standard Setting Process: all respondents were satisfied with the decision making process. The voting process can be considered as <b>Conforming to</b> the PEFC Requirements.</p> <p>All the PEFC Luxembourg standards and procedural documents were brought into voting at the TC Meeting of 2013-07-08.</p>

			<p>PEFC ST 1001 only prescribes requirements for standardising bodies in the development and revision of forest management standards and scheme-specific CoC standards. As PEFC Luxembourg fully adopted all versions of the PEFC's CoC Standards (incl. the latest PEFC ST 2002:2013), this means that only the Luxembourg's forest management standard (LFCS ST 1002) should be voted on. However PEFC Luxembourg procedural document LFCS PD 1001, 1.1 states: <i>"This document covers procedures for the development of the LFCS standards for sustainable forest management and for respective requirements for certification bodies in order to ensure objectivity, efficiency, transparency and consensus built amongst the participating interested stakeholders."</i></p> <p>In the Minutes of TC 2014-07-08 there are only 6 positive votes for LFCS 1004:2013 (Requirements for bodies providing audit and certification of Forest Management) There were 4 positive votes during the meeting and 2 positive votes on the postal ballots, with one postal ballots being an abstention. This means that no majority of the votes of 7 (i.e. 7 of 9) was achieved.</p> <p>The process does not conform to PEFC Luxembourg's procedures ( LFCS PD 1001), but conforms to PEFC ST 1001. The consultant is requested by the PEFC to assess against PEFC ST 1001, therefore the LFCS is considered conform to this requirement.</p> <p><b>Conforms</b></p>
<p>5.9 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p>			
<p>a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,</p>	<p>Procedures</p>	<p>YES</p>	<p>LFCS PD 1001, p13, 5.4.2.3 <i>"In any case of a negative vote which represents sustained opposition of any important part of the concerned interests to a substantive issue, the issue shall be resolved using the following mechanism:</i>  <i>a) Discussion and negotiation on the disputed issue within the Technical Committee in order to find a compromise;"</i></p> <p><b>Conforms</b></p>
	<p>Process</p>	<p>YES</p>	<p>According to the Minutes of the Technical Committee no negative vote was expressed by any member of the Technical Committee. Also there was no mention of a dispute or a "sustained opposition".</p> <p>No respondent to the stakeholder survey had an issue or disagreed with the processes during</p>



			the latest Standard Setting Process. <b>Conforms</b>
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	LFCS PD 1001, p13, 5.4.2.3 <i>"In any case of a negative vote which represents sustained opposition of any important part of the concerned interests to a substantive issue, the issue shall be resolved using the following mechanism: b) 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> <b>Conforms</b>
	Process	YES	According to the Minutes of the Technical Committe no negative vote was expressed by any member of the Technical Committee. Also there was no mention of a dispute or a "sustained oppposition. No respondent to the stakeholder survey had an issue or disagreed with the processes during the latest Standard Setting Process. <b>Conforms</b>
c) dispute resolution process.	Procedures	YES	LFCS PD 1001, p13, 5.4.2.3 <i>"In any case of a negative vote which represents sustained opposition of any important part of the concerned interests to a substantive issue, the issue shall be resolved using the following mechanism: c) Dispute resolution process</i>  <i>Note 2: The dispute resolution process shall be governed by LFCS PD 1002."</i> <b>Conforms</b>
	Process	YES	According to the Minutes of the Technical Committe no negative vote was expressed by any member of the Technical Committee. Also there was no mention of a dispute or a "sustained oppposition. No respondent to the stakeholder survey had an issue or disagreed with the processes during the latest Standard Setting Process. <b>Conforms</b>
5.10 Documentation on the implementation of the standard- setting process shall be made publicly available.	Procedures	YES	LFCS PD 1001, p11, 5.3.2 <i>"Public announcement 5.3.2.1 The Secretariat shall make a public announcement of the start of the standard setting process in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful participation. The announcement shall include:</i>

			<p>a) The project proposal (see 5.2.1)</p> <p>b) Information about opportunities for stakeholders to participate in the process;</p> <p>c) An invitation to comment on the scope and the standard-setting process; and</p> <p>d) Reference to publicly available standard-setting procedures.</p> <p>e) Invitation of stakeholders to nominate their representatives to the Technical Committee."</p> <p>LFCS PD 1001, p14, 5.5.2.5 "The received comments and views shall be considered by Technical Committee in an open and transparent way and these comments as well as results of their consideration shall be made publicly available in a timely manner through the LFCS website or upon request".</p> <p>LFCS PD 1001, p15, 5.7 "Publication stage Within four weeks of the formal approval of the developed document, the Secretariat shall correct any errors in the formally approved document and make it, together with the standard setting report, publicly available at the website and publish an announcement on the formally approved document in a suitable media."</p> <p><b>Conforms</b></p>
	Process	YES	<p>LFCS PD 1001:2013 is available on the website www.pefc.lu, also a special page is made available in French and German: Revision 2013 des LFCS, On this page the following documents are made public: The standard setting report, the comments received, Form for the submission of comments, complaints and their resolutions, and the email address of M. Dostert to send the comments. The project proposal is also available on the website: Projektvorschlag zur Revision the link at the French site: Projet de révision détaillé had no information. (date: 26-01-2014)</p> <p>Articles in the press: Luxemburger Wort: 21-02-2013, Le Quotitien: 13-02-2013.</p> <p><b>Conforms</b></p>
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus	Procedures	YES	<p>LFCS PD 1001, p13, 5.4.2 "Consensus building 5.4.2 Konsensbildung</p> <p>5.4.2.1 The decision of the Technical Committee to recommend a Final draft for a formal approval (see 5.6) shall be taken on the basis of the consensus principle and in compliance with chapter 4.5.6."</p> <p><b>Conforms</b></p>

reached by the working group/committee.	Process	YES	On the 19th July 2013, the Board of Directors voted and the Documents LFCS PD 1003:2013 and PD 1004:2013 LFCS were unanimously adopted. Documents LFCS ST 1001, 1002, 1003 and 1004 as well as PEFC / LFCS ST 2001:2008, 2002:2010, 2002:2013 and 2003:2012 where also unanimously recommended for adoption by the General Assembly. On 31st July 2013, the General Assembly adopted the final standards LFCS 1001, 1002, 1003 and 1004. <b>Conforms</b>
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Procedures	YES	LFCS PD 1001, p15, 5.7 " <i>Publication stage Within four weeks of the formal approval of the developed document, the Secretariat shall correct any errors in the formally approved document and make it, together with the standard setting report, publicly available at the website and publish an announcement on the formally approved document in a suitable media.</i> " <b>Conforms</b>
	Process	YES	The revised scheme documentation is published at the PEFC Luxembourg's website, on the 1st of August 2013. The press release on the publication of the scheme documentation is also dated the 1st of August 2013. <b>Conforms</b>
<b>Revisions of standards/normative documents</b>			
6.1 The standards/normative documents shall be reviewed and revised at intervals that do not exceed a five-year period. The procedures for the revision of the standards/normative documents shall follow those set out in chapter 5.	Process	YES	LFCS PD 1001, p17, 7.1 " <i>The LFCS standards shall be reviewed and revised in regular intervals that do not exceed five years. The procedures for the review and revision of the LFCS standards shall follow the stages outlined in chapter 5.</i> " PEFC Luxembourg revised its scheme in a shorter period than the required five years revision cycle. PEFC Luxembourg scheme was originally adopted on 18 June 2009; then endorsed by the PEFC Council in July 2010; this makes the endorsement valid until July 2015. <b>Conforms</b>
6.2 The revision shall define the application date and	Process	YES	LFCS PD 1001, p17, " <i>7.2 The revision shall define the application date and transition date of the revised documents. The application dates are published on the second page of the Standards</i> ",

<p>transition date of the revised standards/normative documents.</p>			<p>The transition date is not published in LFCS ST 1002, LFCS ST 1003, LFCS ST 1004. The following line is adopted: <i>“This standard replaces the relevant part of the LFCS scheme documentation from 2009 with the transition period valid until the first surveillance or recertification audit after this standard’s application date.”</i> The introductory document LFCS ST 1001 is new within the LFCS structure, so no transition date is needed. <b>Conforms</b></p>
<p>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.</p>	<p>Process</p>	<p>YES</p>	<p>LFCS PD 1001, ch. 7.4 requires that <i>“the transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period”</i>. LFCS ST 1001: p2, Application date: 2014-08-01, LFCS ST 1002: p2, Application date: 2014-08-01, LFCS ST 1003: p2, Application date: p2, 2015-08-01. <b>Conforms</b></p>
<p>6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.</p>	<p>Process</p>	<p>YES</p>	<p>LFCS PD 1001, ch. 7.4 <i>“requires that the transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.”</i> Most transition dates are less than one year. An exception is made for LFCS ST 1004: p2, Application date: 2015-08-01 In the Checklist completed by the LFCS a reason is mentioned: Only one certificate strongly aligned with the German national PEFC scheme, PEFC Luxembourg has decided to change from ISO 17065 to ISO 17021 (as also requested in PEFC ST 1004:201x, enquiry draft). This requires the accreditation body to develop a new accreditation programme based on ISO 17021 and the transition period has therefore been aligned with the changes in the PEFC German forest certification scheme. <b>Conforms</b></p>

## 15. PART II: STANDARD AND SYSTEM REQUIREMENT CHECKLIST FOR GROUP FOREST MANAGEMENT CERTIFICATION (PEFC ST 1002:2010)

### 15.1 Scope

Part II covers requirements for group forest management certification as defined in PEFC ST 1002:2010, *Group Forest Management Certification – Requirements*. Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

### 15.2 Checklist

Question	YES/NO	Reference to system documentation
<b>General</b>		
4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:		
a) the group organisation,	YES	LFCS ST 1003, ch. 3.5 "A group of participants represented by the group entity for the purposes of implementation of the sustainable forest management standard and its Certification." <b>Conforms</b>
b) the group entity,	YES	LFCS ST 1003, ch. 3.2 "An entity that represents the participants, with overall responsibility for ensuring the conformity of forest management in the certified area to the sustainable forest management standard and other applicable requirements of the forest certification scheme." <b>Conforms</b>

c) the participant,	YES	LFCS ST 1003, ch. 3.6 "A forest owner/manager or other entity covered by the group 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." <b>Conforms</b>
d) the certified area,	YES	LFCS ST 1003, ch. 3.1 "The forest area covered by a group forest certificate representing the sum of forest areas of the participants" <b>Conforms</b>
e) the group forest certificate, and	YES	LFCS ST 1003, ch. 3.3 "A document confirming that the group organisation complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certification scheme." <b>Conforms</b>
f) the document confirming participation in group forest certification.	YES	LFCS ST 1003, ch. 3.7 "A document issued to an individual participant that refers to the group forest certificate and that confirms the participant as being covered by the scope of the group forest certification" <b>Conforms</b>
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.	YES	LFCS ST 1003, ch. 4.6 "The participant can only be involved in one forest certification under the PEFC Luxembourg Forest Certification Scheme" Because of this requirement it is not possible that the participant is covered by more than one certificate and thus the situation described in PEFC ST 1002:2010, ch 4.1.2. will never occur. <b>Conforms</b>

<p>4.1.3 The forest certification scheme shall define requirements for group forest certification which ensure that participants' conformity with the sustainable forest management standard is centrally administered and is subject to central review and that all participants shall be subject to the internal monitoring programme.</p>	<p>YES</p>	<p>LFCS ST 1003, ch 4.2 "<i>The group entity shall take responsibility for the participants' conformity with the requirements of the PEFC Luxembourg Forest Certification Scheme; shall administer the participants' conformity; and carry out a central review of the group organisation.</i>"</p> <p>LFCS ST 1003, ch. 5.17 "<i>The group entity shall establish an internal audit programme that covers all participants. The group entity shall determine a sample of participants to be annually audited within the internal audit programme. The size of the sample shall be at least the square root of the number of the participants: <math>(y=\sqrt{x})</math>, rounded to the nearest whole number and the sample shall be representative concerning the ownership type and property size of the participants in the group organisation.</i>"</p> <p>These two regulations describe that the certification requirements must be a centrally administered and reviewed including frequency and sample size.</p> <p><b>Conforms</b></p>
<p>4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.17 "<i>The group entity shall establish an internal monitoring programme that covers all participants. The group entity shall determine a sample of participants to be annually audited within the internal monitoring programme. The size of the sample shall be at least the square root of the number of the participants: <math>(y=\sqrt{x})</math>, rounded to the nearest whole number and the sample shall be representative concerning the ownership type and property size of the participants in the group organisation.</i>"</p> <p>This paragraph describes an annual audit and the sample size is commonly accepted as being sufficient.</p> <p><b>Conforms</b></p>
<p><b>Functions and responsibilities of the group entity</b></p>		
<p>4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:</p>		

<p>a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.4 <i>"The group entity shall take joint responsibility for the communication and relationship with the certification body; submission of an application for certification; and are jointly holders of the group certificate"</i> <b>Conforms</b></p>
<p>b) To provide a commitment on behalf of the whole group organisation to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.2 <i>"The state forest administration and Groupement des Sylviculteurs a.s.b.l. shall make joint commitment on behalf of the group entity and participants to comply with the requirements for sustainable forest management (PEFC ST 1002) and other applicable requirements of the PEFC Luxembourg Forest Certification Scheme."</i> <b>Conforms</b></p>
<p>c) To establish written procedures for the management of the group organisation;</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.3 <i>"the group entity shall elaborate written procedures for the management of the group organisation"</i> <b>Conforms</b></p>
<p>d) To keep records of:</p> <ul style="list-style-type: none"> <li>- the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme,</li> <li>- all participants, including their contact details, identification of their forest property and its/their size(s),</li> <li>- the certified area,</li> <li>- the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;</li> </ul>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.18 <i>"The group entity shall keep records relating to the group organisation. The records shall include at least the following information: name and address of the participant; forest area; type of ownership (private or public); date of issue of the document confirming the participation and its validity; the written commitments; internal audit programme, its review and preventive and corrective measures."</i></p> <p>The requirement covers all requisites mentioned except for the certified area: the mentioned forest area is not necessarily the same as certified area. (Definition: LFCS ST 1003, 3.1 <i>"Certified area: The forest area covered by a group forest certificate representing the sum of forest areas of the participants."</i>)</p> <p>The definition of forest area in a group certification is the sum of forest areas of the participants in the group certification and the forest area of each participant in a group certification is recorded, this automatically means that the forest area in the group certification equals the certified area in the group certification.</p> <p><b>Conforms</b></p>



<p>e) To establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the sustainable forest management standard;</p>	<p>YES</p>	<p>First edition: LFCS ST 1003, ch. 5.11 <i>"the group entity shall establish connection with all participants in group organisation based on written "commitment of the participant defined in ch 5.5."</i></p> <p>The text of chapter LFCS ST 1003, ch. 5.3 (<i>"...including procedures for procedure for exclusion of a participant from the group organisation in the case of major non-conformities with the certification requirements"</i>) is needed to cover this requirement, but is not part of the commitment as described in LFCS ST 1003 ch 5.5)</p> <p>The Board of PEFC Luxembourg (Conseil d'Administration de PEFC Luxembourg a.s.b.l) has formally approved the following statement in chapter 5.5 in LFCS ST 1003: <i>"...a statement that the participation in the group organisation can be terminated in case of major non-conformities"</i>. The corrigenda (document: LFCS ST 1003 Group – corrigenda 1_2014-02-06) was approved unanimously on 6 February 2014 by 3 Board member votes (see document: 6-5 BoD minutes 06.02.2014). By adding this statement in chapter 5.5 the LFCS (LFCS ST 1003 Group – corrigenda 1_2014-02-06) conforms to this criteria.</p> <p><b>Conforms</b></p>
<p>f) To provide participants with a document confirming participation in the group forest certification;</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.14 <i>"The group entity shall provide the participants with the document confirming the participation in group forest certification."</i></p> <p><b>Conforms</b></p>
<p>g) To provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.6 – 5.10</p> <p>5.6--&gt; shall elaborate , make available to all participants a technical document</p> <p>5.7 --&gt; shall elaborate and make available to all participants a guideline for the elaboration of a cartography.</p> <p>5.8 --&gt; shall elaborate and make available to all participants a sample contractual documentation</p> <p>5.9 --&gt; shall elaborate and make available to all participants with more than 50 ha of forests a guideline for the elaboration of a management document.</p> <p>5.10 --&gt; shall provide the participants with additional guidance and assistance as needed</p> <p>The LFCS conforms to this PEFC criteria.</p> <p><b>Conforms</b></p>

<p>h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.17 <i>"The group entity shall establish an internal monitoring programme that covers all participants. The group entity shall determine a sample of participants to be annually audited within the internal monitoring programme. The size of the sample shall be at least the square root of the number of the participants: <math>(y=\sqrt{x})</math>, rounded to the nearest whole number and the sample shall be representative concerning the ownership type and property size of the participants in the group organisation."</i></p> <p><b>Conforms</b></p>
<p>i) To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 5.15 <i>"The group entity shall review the participants' conformity with the certification requirements including reviewing of a) participants' written commitments; b) results of internal and external audits; c) results of preventive and corrective measures."</i></p> <p>Requirement covers all requisites mentioned in PEFC ST 1002:2010, ch 4.2.1 i</p> <p><b>Conforms</b></p>
<p><b>Function and responsibilities of participants</b></p>		
<p>4.3.1 The forest certification scheme shall define the following requirements for the participants:</p>		
<p>a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 6.1 <i>"the participant shall provide the group entity with the written commitment as described in 5.3"</i></p> <p>First edition: Requirement 5.5 covers all requisites mentioned in 4.3.1 a instead of 5.3"</p> <p>Second edition: Chapter 6.1 of LFCS ST 1003 now refers to chapter 5.5. See document LFCS ST 1003 Group – corrigenda 1_2014-02-06.</p> <p><b>Conforms</b></p>
<p>b) To comply with the sustainable forest</p>	<p>YES</p>	<p>LFCS ST 1003, ch. 6.2 <i>"the participant shall perform forest management activities in compliance</i></p>

management standard and other applicable requirements of the forest certification scheme;		<i>with the forest management requirements included in LFCS 1002.</i> " Direct reference to LFCS 1002 demands full compliance with LFCS forest management standard <b>Conforms</b>
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	LFCS ST 1003, ch. 6.6 <i>"The participant shall 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 internal and external audits, or reviews, or otherwise"</i> <b>Conforms</b>
d) To implement relevant corrective and preventive actions established by the group entity.	YES	LFCS ST 1003, ch. 6.7 <i>"The participant shall implement relevant corrective and preventive actions established by the group entity."</i> <b>Conforms</b>

## 16. PART III: STANDARD AND SYSTEM REQUIREMENT CHECKLIST FOR SUSTAINABLE FOREST MANAGEMENT (PEFC ST 1003:2010)

### 16.1 Scope

Part III covers requirements for sustainable forest management as defined in PEFC ST 1003:2010, *Sustainable Forest Management – Requirements*. Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

### 16.2 Checklist

Question	YES/NO	Reference to scheme documentation
<b>General requirements for SFM standards</b>		
4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall		
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.	YES	See Reference LFCS ST 1002 includes both, management as well as performance requirements. All the requirements are applicable at the forest management unit level. In cases, where the requirement can also be applied at another than forest management unit level, this is stated in a note to the requirement.  LFCS includes all requirements <b>Conforms</b>
b) be clear, objective-based and auditable.	NO	Ambiguity on the audit ability of the term periodically: LFCS ST 1002, 5.1.4, “ <i>Monitoring of the forest resources and evaluation of their management should</i>

		<p><i>be periodically performed and their results should be fed back into the planning process.”.</i></p> <p>LFCST 1002, 5.2.2 <i>“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.”</i></p> <p>The consultant is of the opinion that forest monitoring is the basis for determining compliance with the sustainable management objectives of the forest areas.</p> <p>PEFC Luxembourg stated in the document ‘Responses after draft report’: <i>“Chapter 5.1.4 includes requirements for monitoring. The periodicity of the monitoring will depend on the type of ownership, size of the forest property, as well as the factors to be monitored. Therefore the term “periodically” without further specification is appropriate here.”</i></p> <p>Furthermore PEFC Luxembourg stated: <i>“Chapter 5.2.2 relates to the monitoring of biotic and abiotic factors. The periodicity of this monitoring will depend on the factors influencing the forest property (each factor might have different need for periodicity); size of forest property, intensity of forest management, etc. Therefore the terminology used is appropriate.”</i></p> <p>The consultant does not agree with the argumentation that forest monitoring frequency cannot be defined due to differences in forest area and type of ownership: At least a minimum monitoring time-frequency should be defined to enable auditors to verify sustainable management objectives and to verify compliance with the forest management plans.</p> <p><b>Non-Conform (minor)</b></p>
<p>c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.</p>	<p>YES</p>	<p>See Reference LFCST 1003, ch. 1.2 <i>“This document is mandatory for all actors in forest certification in the Grand Duchy of Luxembourg”</i></p> <p>LFCST 1003, ch. 4.4 <i>“Forest owner/manager shall ensure that forest management activities performed by contractors or other entities on his/her forest land comply with the relevant requirements of this standard.”</i></p> <p>Combination of the two paragraphs insures conformity of paragraph 4.1c</p> <p><b>Conforms</b></p>

<p>d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.</p>	<p>YES</p>	<p>See Reference LFCS ST 1003, ch. 5.18 <i>“The group entity shall keep records relating to the group organisation. The records shall include at least the following information: name and address of the participant; forest area; type of ownership (private or public); date of issue of the document confirming the participation and its validity; the written commitments; internal audit programme, its review and preventive and corrective measures.”</i> <b>Conforms</b></p>
<p><b>Specific requirements for SFM standards</b></p>		
<p><b>Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle</b></p>		
<p>5.1.1 Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of the economic, ecological, cultural and social values of forest resources, including soil and water. This shall be done by making full use of related services and tools that support land-use planning and nature conservation.</p>	<p>YES</p>	<p>See reference LFCS ST 1002, ch. 5.1.1 <i>“Forest management planning shall aim to maintain or increase forest and other wooded area, and enhance the quality of the economic, ecological, cultural and social values of forest resources, including soil and water. This should be done by making full use of related services such as land-use planning and nature conservation”</i>.  In addition to this chapter, several other chapters, for example: 5.1.8, 5.2.2, 5.2.5, 5.4.2, etc. <b>Conforms</b></p>
<p>5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.</p>	<p>YES</p>	<p>See reference LFCS ST 1002, ch. 5.1.2 <i>“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 the basis for a cycle of continuous improvement to minimize or avoid negative impacts”</i>. <b>Conforms</b></p>

<p>5.1.3 Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document</p>	<p>YES</p>	<p>CS ST 1002, ch. 5.1.2 <i>“The inventory and mapping of forest resources shall be established and maintained, adequate to the local and national conditions, and in correspondence with the topics described in this standard.”</i> <b>Conforms</b></p>
<p>5.1.4 Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They shall be based on legislation as well as existing land-use plans, and adequately cover the forest resources.</p>	<p>YES</p>	<p>See Reference LFCS ST 1002, ch. 5.1.3 <i>“Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They should be based on legislation as well as existing land use plans, and adequately cover the forest resources. The 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 allowable cut, including its justification. Management plans or their equivalents, shall respect biotopes listed by Article 17 of the Loi du 29 janvier 2004 concernant la protection de la nature et des ressources naturelles telle qu’elle a été modifiée.”</i> This reference from LFCS ST 1002 is a literal copy of paragraph 5.1.4 of the PEFC criteria. In addition the text and notes indicate the minimum requirements for the management plans and indications for the land use maps. <b>Conforms</b>  Note: The definition ‘periodically’ must still be defined for monitoring in the LFCS (see PEFC criteria 4.1.b). PEFC criteria 4.1. b. is currently assessed as a non-conformity.</p>
<p>5.1.5 Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products</p>		<p>See reference LFCS ST 1002, ch. 5.1.3 includes mandatory elements of the forest management plans.  See reference LFCS ST 1002, ch 5.1.8 does not require the forest management plans to include allowable harvest of non-timber products due to the fact that there is no non-wood forest product that would be utilized by forest owners/managers for commercial purposes. Also game management is separated from the forest management itself and governed and controlled by the state authorities. <b>Conforms</b></p>

<p>5.1.6 A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is publicly available. The summary may exclude confidential business and personal information and other information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.</p>	<p>YES</p>	<p>LFCS ST 1002 does not have an explicit requirement to make summaries of forest management plans publicly available/accessible. The requirement and especially its objective is met by alternative means:</p> <ul style="list-style-type: none"> <li>- Total forest area in Luxembourg is very small (90.000 hectares) with low risk of unsustainable forest management practices.</li> <li>- Public forest owners (both state and communes) represent 44 % of forests (11% state, 33 % municipalities). Those forests are public and their managers are accountable and answerable to the public and their elected officials. It is generally assumed, following the European legislation on free access to information that information kept by public bodies are accessible to the public upon request.</li> <li>- Vast majority of private forest owners are extremely small, 99 % of all private forest owners are below 50 hectares (13,711 out of 13,785 – EU Forestry statistics) and they are exempt by the forest management standard from the formal comprehensive forest management plan. In case of these forests, they are, following the certification standard, accessible by public and quality of information about the forest management obtained by observation in the forest areas is comparable by having access to a summary of a very simple management document. (Data made available by PEFC Luxembourg in their submitted checklist).</li> </ul> <p>For larger areas (&gt;20 ha), receiving public subsidies, forest management plans should be accessible through the state administration.( Règlement grand-ducal du 13 mars 2009 concernant les aides aux mesures forestières en agriculture et en forêt (2009)).</p> <p>Forest management plans for smaller forest areas will not be accessible to the main public. However, the requirement states that: “A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management...” The definition “or its equivalent” could be referred to the public’s free accessibility of the smaller plantations. Furthermore it is mentioned that it should be “appropriate to the scope and scale”. Making 13,711 forest management plans smaller than 50 ha. publicly available through PEFC Luxembourg or each individual forest owner can be considered as impractical. As such, the consultant considers the LFCS is in conformance with this requirement.</p>
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		<b>Conforms</b>
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	See Reference LFCS ST 1002, ch. 5.1.4 <i>“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.”</i> <b>Conforms</b>
5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	LFCS ST 1002, ch. 4.1, p6, <i>“Responsibilities for sustainable forest management shall be clearly defined and assigned”</i> . <b>Conforms</b>
5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.	YES	<p>LFCS ST 1002, ch. 5.1.5 <i>“Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates.”</i></p> <p>Paragraph describing minimizing damage: LFCS ST 1002, ch. 5.3.4 <i>“Regeneration, tending and harvesting operations shall be carried out in time, and in a way that do 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.”</i></p> <p>LFCS ST 1002, ch. 5.2.5 <i>“harvesting and transport techniques that minimize tree and/or soil damages shall be applied.”</i></p> <p>LFCS ST 1002, ch. 5.5.5 <i>“Special care shall be given to forest management practices on forest areas with water protection function, especially drinking water catchment areas, to avoid adverse effects on the quality and quantity of water resources.”</i></p> <p>LFCS ST 1002, ch. 5.3.6 requires that <i>“harvesting levels of both wood and non-wood forest products should not exceed a rate that can be sustained in the long term”</i></p> <p>The references in the LFCS to Non Timber Forest Products (NTFP’s) is not consistent with point 5.1.5. of this checklist, which mentions that forest management plans do not need to include allowable harvest of non-timber products due to the fact that there is no non-wood forest product that would be utilized by forest owners/managers for commercial purposes(...). PEFC Luxembourg</p>

		<p>also explains that the requirement concerning non-wood forest products is not necessary because of existing national regulation. However from the explanation of PEFC Luxembourg and LFCS documentation it becomes clear that the objective of the LFCS is to sustainable manage forests (both in planning and practice) with respect to timber resources, non-timber resources, social, economic, ecological and cultural factors (see LFCS ST 1002, chapter 5.1.1 and 5.3.1) and to protect soil and retained trees during forest operations (see chapter 5.3.4). The regulation, monitoring and control of NTFP's is also covered in LFCS ST 1002, chapter 5.1.2 and 5.1.4. Based on this argumentation the consultant is of the opinion that the LFCS conforms to this PEFC criteria.</p> <p>It should be noted here that the frequency/periodicity for the monitoring cycle is not specifically defined. This is also assessed as a non-conformity of the LFCS. However, for this specific PEFC requirement a definition for periodic cycle is not required (PEFC is limiting the definition for time to 'medium and long term' in this criteria).</p> <p><b>Conforms</b></p>
<p>5.1.10 Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.1.6 <i>“Appropriate silvicultural measures shall be taken to maintain or reach the growing stock of resources at - or bring to -a level that is economically, ecologically and socially desirable.”</i></p> <p><b>Conforms</b></p>
<p>5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:</p>		<p>See References LFCS ST 1002, ch. 5.1.8 <i>“Conversion of forest to non-forest use is prohibited on principle. Any exemption can only be applied in cases where it entails a small proportion of forest type, does not have negative environmental impacts and makes positive contribution to long-term conservation, economic, and social benefits. Such a conversion requires permission from the Ministry of Sustainable Development and Infrastructure that considers scale, public interest; and environmental, economic and social impacts of the conversion.”</i></p>
<p>a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.4.7 <i>“Transformation of forests similar to natural forests to conifer plantations shall be prohibited.”</i></p> <p>The combination of the two paragraphs make sure that no conversion can be carried out unless there are justified circumstances (see chapter 5.1.8) and there is a permission from the Luxembourg Ministry of Sustainable Development. Without such prerequisites, it will be prohibited to convert</p>

b) entails a small proportion of forest type; and	YES	forests to non-forest or to convert natural forests to conifer plantations. The fact that for any conversion a permission from the Ministry of Sustainable Development and Infrastructure is required, assures that conversion will be in compliance with national and regional policy and legislation. <b>Conforms</b>
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	YES	
d) makes a contribution to long-term conservation, economic, and social benefits.	YES	
5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.	YES	LFCS ST 1002, ch. 5.1.7 <i>“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.”</i> <b>Conforms</b>
5.2.1 Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.	YES	LFCS ST 1002, ch. 5.2.1 <i>“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.”</i> <b>Conforms</b>
<b>Criterion 2: Maintenance of forest ecosystem health and vitality</b>		
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,	YES	LFCS ST 1002, ch. 5.2.1 <i>“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”.</i> <b>Conforms</b>

<p>overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>		<p>LFCS ST 1002, ch 5.2.2 <i>“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.”</i></p> <p><b>Conforms</b></p> <p>Note: The definition ‘periodically’ must be specifically defined in the LFCS (see PEFC criteria 4.1.b).</p>
<p>5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems shall take into consideration the effects of naturally occurring fire, pests and other disturbances.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.2.2 <i>“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.”</i></p> <p>Requirements 5.2.2 and 5.2.3 ensure that all factors (not only natural) are considered in the monitoring and management planning</p> <p><b>Conforms</b></p>
<p>5.2.4 Forest management plans or their equivalents shall specify ways and means to minimize the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.2.3 <i>“Management plans or their equivalents shall specify ways and means to minimize the risk of degradation of and damages to forest ecosystems. Forest management planning should make use of those policy instruments set up to support these activities.”</i></p> <p><b>Conforms</b></p> <p>Note: The wording ‘should’ in the second line must be changed to ‘shall’</p>
<p>5.2.5 Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the</p>	<p>YES</p>	<p>See Reference LFCS ST 1002, ch. 5.2.4 <i>“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 stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.”</i></p> <p>See Reference LFCS ST 1002, ch 5.2.5 <i>“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</i></p>

<p>forests to adverse environmental factors and strengthen natural regulation mechanisms.</p>	<p><i>damages shall be applied."</i></p> <p>Additional requirements to increase and maintain (native) biological diversity:</p> <ul style="list-style-type: none"> <li>- LFCS ST 1002, ch. 5.2.8 <i>"The use of integrated plant protection methods with appropriate silviculture and other biological measures shall be preferred. Biological methods for the protection of plants like protection of anthills, installation of nest boxes and perches for birds of prey, etc. should be propagated."</i></li> <li>- FCS ST 1002, ch. 5.4.8 <i>"For reforestation and afforestation, origins of native species and local provenances that are well adapted to site conditions, for example from seeds collected at the site, shall be preferred, where appropriate."</i></li> <li>- LFCS ST 1002, ch. 5.4.9 <i>"In respecting the local climatic conditions, the focus should be on native deciduous species. Non-native deciduous or conifer species shall only be used after a careful and critical examination. Species sensible to water stress (spruce, pedunculate oak, beech, ash) shall be avoided on dry sites or sites with important changes in water supply"</i>.</li> <li>- LFCS ST 1002, 5.4.11 <i>"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."</i></li> <li>- LFCS ST 1002, ch. 5.4.13 <i>"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."</i></li> </ul> <p>LFCS ST 1002, ch. 5.4.14 <i>"Special efforts should be made in maintaining and installing forest edges inside and outside the forests as buffer zone with a certain depth, if possible one tree length. This aims at creating structured forest edges allowing the development of trees, bushes and grass. The edges of the forests should not be afforested with the main species. If they are installed there due to natural regeneration, most of them have to be removed at the immediate border of the forests. The maintenance shall be careful. The borders of old forests that cannot be modified have to be respected when regenerating."</i></p>
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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	See Reference LFCS ST 1002, ch. 5.2.11 <i>“Usage of fire (e.g. slash burning) shall be avoided and is only permitted if it is necessary for the achievement of the forest management goals.”</i> <b>Conforms</b>
5.2.7 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied. The spillage of oil during forest management operations or the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.	YES	See Reference LFCS ST 1002, ch. 5.2.5 <i>“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.”</i> <i>Note: more details on tree species can be found under 5.4.11”.</i>  LFCS ST 1002, ch. 5.2. <i>“The spillage of oil through 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.”</i>  Extra measurements to comply with PEFC ST 1003:2010, ch. 5.2.7 are:  - LFCS ST 1002, ch. 5.2.8 <i>“The use of integrated plant protection methods with appropriate silviculture and other biological measures shall be preferred. Biological methods for the protection of plants like protection of anthills, installation of nest boxes and perches for birds of prey, etc. should be propagated.”</i>  - LFCS ST 1002, ch. 5.4.8 <i>“For reforestation and afforestation, origins of native species and local provenances that are well adapted to site conditions, for example from seeds collected at the site, shall be preferred, where appropriate.”</i>  - LFCS ST 1002, ch. 5.4.9 <i>“In respecting the local climatic conditions, the focus should be on native deciduous species. Non-native deciduous or conifer species shall only be used after a careful and</i>

		<p><i>critical examination. Species sensible to water stress (spruce, pedunculate oak, beech, ash) shall be avoided on dry sites or sites with important changes in water supply."</i></p> <p>- LFCS ST 1002, ch. 5.4.11 <i>"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."</i></p> <p>- LFCS ST 1002, ch 5.2.12 <i>"Damages on remaining stands and seedlings caused by harvesting and skidding shall be avoided by careful forest work."</i></p> <p><b>Conforms</b></p>
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	YES	<p>LFCS ST 1002, ch. 5.2.8 <i>"The use of integrated plant protection methods with appropriate silviculture and other biological measures shall be preferred. Biological methods for the protection of plants like protection of anthills, installation of nest boxes and perches for birds of prey, etc. should be propagated."</i></p> <p>LFCS ST 1002, ch. 5.2.9 <i>"requires that the use of pesticides shall be minimised, taking into account appropriate silvicultural alternatives and other biological measures. The usage of pesticides is only permissible, if there are serious dangers for forest stands or seedlings; and only on the basis of expert advisory; following pesticide producer's instructions; and in compliance with legislation. Substances covered by the WHO Type 1a and 1b (World Health Organisation) and substances that are not allowed by the legislation shall not be used.</i></p> <p><i>Note 1: Substances of pesticides allowed to be used in forest management are defined by "Loi 24 décembre 2002 relative aux produits biocides" and "Règlement grand-ducal du 14 décembre 1994 concernant la mise sur le marché et l'utilisation de produits phytopharmaceutiques".</i></p> <p><i>Note 2: The prohibition of WHO 1a/1b substances covers cyfluthrin as the only substance from this category that is allowed by the legislation to be used in forestry."</i></p> <p>Use of biological methods is preferred, but when needed clear guidelines available on when and how to use pesticides.</p> <p><b>Conforms</b></p>
5.2.9 The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be	YES	<p>LFCS ST 1002, ch. 5.2.9 <i>"Note 2: The prohibition of WHO 1a/1b substances covers cyfluthrin as the only substance from this category that is allowed by the legislation to be used in forestry."</i></p>

prohibited, except where no other viable alternative is available.		<b>Conforms</b>
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	<p>LFCS ST 1002, ch. 5.2.9 <i>“Note 1 Substances of pesticides allowed to be used in forest management are defined by “Loi 24 décembre 2002 relative aux produits biocides” and “Règlement grand-ducal du 14 décembre 1994 concernant la mise sur le marché et l’utilisation de produits phytopharmaceutiques”.</i></p> <p>The national legislation prohibits the use of the indicated pesticides.</p> <p><b>Conforms</b></p>
5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	YES	<p>LFCS ST 1002, ch. 5.2.9 <i>“requires that the use of pesticides shall be minimised, taking into account appropriate silvicultural alternatives and other biological measures. The usage of pesticides is only permissible, if there are serious dangers for forest stands or seedlings; and only on the basis of expert advisory; following pesticide producer’s instructions; and in compliance with legislation. Substances covered by the WHO Type 1a and 1b (World Health Organisation) and substances that are not allowed by the legislation shall not be used.</i></p> <p>LFCS ST 1002, ch 5.6.5 <i>“Forest owners, forest managers, contractors, employees and shall be provided with sufficient information and guidance and encouraged to keep up to date through continuous training in relation to sustainable forest management and requirements of this standard.”</i></p> <p><b>Conforms</b></p> <p><u>note:</u> a typo or missing a part of the sentence in ch5.6.5 (employees and [??])</p>
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	YES	<p>LFCS ST 1002, ch. 5.2.10 <i>The use of fertilizers is forbidden on principle. In case fertilizers are used they shall be applied in a controlled manner and with due consideration to the environment and only on the basis of expert advisory; in compliance with legislation. Soil protection fertilisation shall only be carried out after the results of a soil or forest nutrition expertise or when sound site evaluations are available. Fertilisation to increase the timber production is not allowed.</i></p> <p><b>Conforms</b></p>
<b>Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non- wood)</b>		
5.3.1 Forest management planning shall	YES	LFCS ST 1002, ch. 5.3.1 <i>“Forest management planning shall aim to maintain the capability of forests</i>



<p>aim to maintain the capability of forests to produce a range of wood and non- wood forest products and services on a sustainable basis.</p>		<p><i>to produce a range of wood and non-wood forest products and services on a sustainable basis.”</i></p> <p>In criteria 5.1.9. of this checklist PEFC Luxembourg explains that a requirement concerning non-wood forest products is not needed due to existing national regulation. LFCS ST 1002, ch. 5.3.6 includes a requirement concerning non-wood forest products. One is not consistent with the other, as also explained in 5.1.9.</p> <p>PEFC Luxembourg’s response after the Draft Report was: ‘Chapter 5.3.1 of PEFC ST 1001 does not relate to the exploitation of non-wood forest products and services but requires to ensure “capability of forests to produce non-wood forest products and services”.’ The forest management can have and has impacts on non-wood forest products and especially forest services, even where they are not exploited for commercial activities or where the exploitation cannot be controlled by the forest owner. E.g. forest management practices have impact on game population, fish population, recreation services, etc. Therefore, LFCS ST 1002, 5.3.1 now includes a statement that forest management shall maintain the capability of forests to produce non-wood forest products and services.</p> <p><b>Conforms</b></p>
<p>5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.3.2 <i>“Forest management planning shall 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.”</i></p> <p><b>Conforms</b></p>
<p>5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.3.3 <i>“Management plans or their equivalents shall take into account the different uses or functions of the forest area. Forest management planning and practices shall support, over the long term, the diversified production of merchantable and non-merchantable forest goods and services.”</i></p> <p><b>Conforms</b></p>

<p>5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.3.3 <i>“Management plans or their equivalents shall take into account the different uses or functions of the forest area. Forest management planning and practices shall support, over the long term, the diversified production of merchantable and non-merchantable forest goods and services.”</i> <b>Conforms</b></p>
<p>5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.3.4 <i>“Regeneration, tending and harvesting operations shall be carried out in time, and in a way that do 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.”</i></p> <p>Next paragraph prohibits full tree logging and dictates that care should be applied to the site after logging: LFCS ST 1002, ch 5.3.5 <i>“Tending and thinning methods, adapted to internal objectives shall be guaranteed. Full tree logging (including roots) of big extent shall be prohibited. The harvesting of non-mature stands shall be prohibited. It is recommended to make early and important thinnings, especially in stands with high initial densities, in order to raise vitality and stability of stands, and to limit the competition vis-à-vis water and mineral stock, and to support the best individuals. Especially at the stage of cleaning, intensive care should be applied to stands to support their diversity, strength and quality.”.</i> <b>Conforms</b></p>
<p>5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.3.6 <i>“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.”</i> <b>Conforms</b></p>
<p>5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.</p>	<p>YES</p>	<p>In Luxembourg hunting and fishing are regulated, monitored, and controlled by the state authorities. (according to checklist LFCS) In the Reponse after the Draft report PEFC Luxembourg stated: <i>“It should be noted that the non-wood forest products in Luxembourg have no commercial significance. Potential non-wood products could be mushrooms and berries, hunting, to some extent also fishing. However, forest owners cannot exclude the general public from the exploitation of non-wood forest products such as mushrooms and berries; hunting (as well as fishing) is fully controlled and regulated by the</i></p>

		<p>government. By law, forest owners shall place their land into a syndicate that rents the hunting rights to the third party or the hunting is completely excluded from the land management.                  2) For that reason, the LFCS standard does not have specific requirements for “maximum annual harvest” of non-wood forest products in the forest management plans (PEFC ST 1003, 5.1.5) and for the “controlled, regulated and monitored exploitation” of non-wood forest products (5.3.7).  <b>Conforms</b></p>
<p>5.3.8 Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.3.7 “Adequate infrastructure, such as roads, skid tracks or bridges shall be planned, established and maintained to ensure:</p> <ul style="list-style-type: none"> <li>a) efficient delivery of goods and services;</li> <li>b) minimisation of damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, threatened or other key species - in particular their migration patterns;</li> <li>c) minimisation of bare soil exposure, avoidance of introduction of soil into watercourses, preservation of the natural level and function of water courses and river beds, including proper road drainage facilities.</li> <li>d) Driving off tracks on whole sites shall be omitted on principle.”</li> </ul> <p>Even more detailed information on the do’s and don’ts can be found in: LFCS ST 1002, ch. 5.3.8 “Planning and construction of the forest infrastructure shall:</p> <ul style="list-style-type: none"> <li>a) integrate forest roads harmoniously in the landscape; avoid steep slopes and important rubble;</li> <li>b) limit the density of passable roads to 25-40 m/ha, if the topographic conditions and configurations of the property allow it;</li> <li>c) respect the good practice in planning roads concerning the slopes, the radius of turns, the thickness of the surface, the use of an anti-contamination mat and the draining; Soil sealing with concrete or tar roads shall only be permitted in the case of major traffic security reasons.</li> <li>d) complete the network of forest roads with permanent system of skidding tracks that should be installed in the young stands, without any special underground except a layer of harvest leftovers;</li> </ul>

		<p>The distance between skidding tracks shall not be smaller than 20 meters. On soils sensitive to compression the distance should be even larger.</p> <p>e) limit the width of the roads to 3,50 m and the width of the loading area to 5 m, storage areas not included. For an appropriate inclination of the slopes, trees have to be removed on a stripe of 8 m width. This stripe can be larger when the terrain is uneven;</p> <p>f) use, whenever possible, natural materials of the region.”</p> <p><b>Conforms</b></p>
<b>Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems</b>		
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	<p>LFCS ST 1002, ch. 5.4.1 “Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level and, where appropriate, diversity at landscape level.”</p> <p><b>Conforms</b></p>
5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of: a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists; c) endangered or protected genetic <i>in situ</i> resources; and taking into account d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of	YES	<p>LFCS ST 1002, ch. 5.4.2 “Forest management planning, inventory and mapping of forest resources shall identify and protect ecologically important forest areas containing significant concentrations of: a) protected, rare, sensitive or representative forest ecosystems such as riparian areas, wetland, ravine biotopes; b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists; c) endangered or protected genetic <i>in situ</i> resources; and taking into account; d) globally, regionally and nationally significant areas as defined by Natura 2000 and protected zones (with natural distribution and abundance of naturally occurring species).”</p> <p>Additional requirements and guidance: LFCS ST 1002, ch. 5.4. “Note 1: The Ministry of Sustainable Development and Infrastructure is responsible for the inventory and mapping of the ecologically important forest areas (<a href="http://map.geoportail.lu">map.geoportail.lu</a>) Note 2: The term “protect” does not necessarily exclude forest management activities that do not damage biodiversity values of those biotopes.</p>

<p>naturally occurring species.</p>		<p><i>Note 3: A list of threatened species is included in law on “la protection integrale et partielle de certains especes de la flore sauvage et fauna sauvage” (see Annex 2).”</i></p> <p><b>Conforms</b></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>	<p>YES</p>	<p>LFCS ST 1002, ch 5.4.3 <i>“Protected and endangered species shall be protected and shall not be damaged during forest management practices.”</i></p> <p><i>Note: A list of protected and threatened species and their protection is defined in law on “la protection integrale et partielle de certains especes de la flore sauvage et fauna sauvage” (see Annex 2).</i></p> <p>Exploitation of any potential species is prohibited by the requirement of obligatory protection of the species. No endangered species are to be found in LFCS forests that can be commercially exploited. (according to the LFCS Checklist).</p> <p><b>Conforms</b></p>
<p>5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate,</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.4.4 <i>“The maintenance of permanent forest cover shall be guaranteed. In cases of opening up of canopies, they shall be regenerated. Natural regeneration shall be preferred, provided that the conditions are adequate to ensure the quantity and quality of the forests resources and that</i></p>

<p>planting that is adequate to ensure the quantity and quality of the forest resources.</p>		<p><i>the existing provenance is of sufficient quality for the site. After shelter wood cutting, shade-loving species can be introduced in stands (conifers) that do not regenerate naturally or that are not site adapted."</i></p> <p><b>Conforms</b></p>
<p>5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.4.5 <i>"The regeneration shall aim at:</i></p> <ul style="list-style-type: none"> <li><i>a) avoiding widespread monoculture by having mixed stands of site adapted tree species with suitable origin;</i></li> <li><i>b) maintenance and promotion of "second degree species", rare tree and shrub species;</i></li> <li><i>c) age, genetic and structural diversity by long regenerating periods, especially in beech forests;"</i></li> </ul> <p>LFCS ST 1002, 5.4.11 <i>"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."</i></p> <p>LFCS ST 1002, 5.4.8 <i>"Reforestation and afforestation, origins of native species and local provenances that are well adapted to site conditions, for example from seeds collected at the site, shall be preferred, where appropriate."</i></p> <p>LFCS ST 1002, 5.4.9 <i>"In respecting the local climatic conditions, the focus should be on native deciduous species. Non-native deciduous or conifer species shall only be used after a careful and critical examination. Species sensible to water stress (spruce, pedunculate oak, beech, ash) shall be avoided on dry sites or sites with important changes in water supply."</i></p> <p><b>Conforms</b></p>
<p>5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.4.14 requires that special efforts should be made in maintaining and installing forest edges inside and outside the forests as buffer zone with a certain depth, if possible one tree length. This aims at creating structured forest edges allowing the development of trees, bushes and grass.</p> <p>Buffer zones improve the ecological connectivity. Paragraph is in line with PEFC requirements.</p> <p><b>Conforms</b></p>
<p>5.4.7 Genetically-modified trees shall not be used.</p>	<p>YES</p>	<p>ST 1002, ch. 5.4.12 <i>"Genetic modified organisms shall not be used."</i></p> <p><b>Conforms</b></p>

<p>5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.4.13 <i>“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.”</i> <b>Conforms</b></p>
<p>5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.4.15 <i>“Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported.”</i> <b>Conforms</b></p>
<p>5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to improve or maintain biological diversity.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.4.16 <i>“Tending and harvesting operations shall be conducted in a way that do not cause lasting damage to ecosystems. Wherever possible, practical measures should be taken to improve or maintain biological diversity. When clearing the forests, undesired vegetation should only to be removed if this is essential for the conservation and growth of forest species.”</i>  Literal copy of 5.4.10 and additional requirements on the removal of undesired vegetation. <b>Conforms</b></p>
<p>5.4.11 Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.3.7 <i>“Adequate infrastructure, such as roads, skid tracks or bridges shall be planned, established and maintained to ensure:</i> <i>a) efficient delivery of goods and services;</i> <i>b) minimisation of damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, threatened or other key species - in particular their migration patterns;</i> <i>c) minimisation of bare soil exposure, avoidance of introduction of soil into watercourses, preservation of the natural level and function of water courses and river beds, including proper road drainage facilities.</i> <i>d) Driving off tracks on whole sites shall be omitted on principle.”</i>  Requirement provides detailed minimum requirements on infrastructure of the forest <b>Conforms</b></p>

<p>5.4.12 With due regard to management objectives, measures shall be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.4.18 <i>“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. The forest owner / manager should, according to his/her means, work towards site adapted game populations.</i></p> <p><i>Note: Adapted densities of game populations are essential for a close to nature forestry within the interest of biological diversity. In case of intensive damages to forest stands, the forest owner’s means is to influence hunting quota through his/her hunting syndicate.”</i></p> <p>LFCS ST 1002, ch. 5.4.19 <i>“Where necessary, forest management practices shall control the intensity of the pressure and damages of the game populations, including fencing of young stands, individual protection, improving habitats for game species, documentation and assessment of the damages.</i></p> <p><i>Note: Protection measures are often essential in order to assure an adequate regeneration of stands. The installations measures for game protection have to be looked after. After usage they have to be dismantled and taken away. As game damage has to be avoided and as game fences cannot be the ideal solutions, it is essential to create good conditions for game (maintenance of undesired vegetation in a way that does not harm the forest plants; installation of food patches by the hunting tenant). Fenced control plots can be a way of documenting the influence of game animals.”</i></p> <p>In point 5.1.9. of this checklist PEFC Luxembourg explains that regulation concerning non-wood forest products is not necessary due to existing national regulation. LFCS ST 1002, ch. 5.4.18 and 5.4.19 includes regulation concerning non-wood forest products.</p> <p><b>Conforms</b></p>
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<p>5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.</p>	<p>LFCS ST 1002, ch. 5.4.20 and 5.4.21 include requirements relating to the dead wood as well as thresholds for the deadwood in forests. and include additional guidance.</p> <p>LFCS ST 1002, ch 5.4.20 <i>“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 health and stability of forests and on surrounding ecosystems. Dead trees and cave trees shall be maintained as far as they do not cause inappropriate economic losses, forest protection conflicts, or traffic security problems.</i></p> <p><i>Note: Economic losses of leaving dead wood can be compensated by participation in Luxembourg’s nature conservation programmes. The forest protection conflicts can occur in vulnerable stands (i.e. risk of spreading of the bark beetle in spruce forests and of beech cancer in beech forests). The traffic security problems represent standing dead trees along roads, tourist’s paths and areas with high number of visitors.”</i></p> <p>LFCS ST 1002, ch 5.4.21 <i>“Standing and fallen dead wood shall be left in the following stages of the forest management:</i></p> <p><i>a) during the regeneration phase some trees of the mature stand, with the aim of 5 % of the trees over 30 cm at the breast height or 5 % of the growing stock of the mature stand, should be preserved.</i></p> <p><i>b) maintenance of old trees and hollow trees after their economic maturity. Especially in beech forests, old trees, standing and fallen dead wood should be dispersed over the forest stands and should cover different stages of the decaying process.</i></p> <p><i>c) when harvesting, a maximum of biomass should be left for decaying purposes. The burning or removal of slashes and leftovers of the harvest shall be avoided, unless it is necessary in order to achieve the objectives of the forest management.”</i></p> <p><b>Conforms</b></p>
<p><b>Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)</b></p>	

<p>5.5.1 Forest management planning shall aim to maintain and enhance protective functions of forests for society, such as protection of infrastructure, protection from soil erosion, protection of water resources and from adverse impacts of water such as floods or avalanches.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.5.1 <i>“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”</i></p> <p>Literal copy of 5.5.1. excl. avalanches <b>Conforms</b></p>
<p>5.5.2 Areas that fulfil specific and recognised protective functions for society shall be registered and mapped, and forest management plans or their equivalents shall take these areas into account.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.5.2 <i>“Areas that fulfill specific and recognised protective functions for society shall be registered and mapped, and forest management plans or their equivalents should take full account of these areas.”</i></p> <p><b>Conforms</b></p>
<p>5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.5.2 <i>“Areas that fulfill specific and recognised protective functions for society shall be registered and mapped, and forest management plans or their equivalents should take full account of these areas.”</i></p> <p>LFCS ST 1002, ch. 5.5.4 <i>“In soil protection forests, clear cuttings and surface covering, mineral level scarifying soil cultivation shall be omitted”</i></p> <p>LFCS ST 1002, ch 5.4.18 <i>“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. The forest owner / manager should, according to his/her means, work towards site adapted game populations.”</i></p> <p>The combination of the three requirements fulfill requirements of paragraph 5.5.3. <b>Conforms</b></p>
<p>5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.5.1 <i>“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.”</i></p>

<p>quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.</p>		<p>LFCS ST 1002, ch. 5.5.5 <i>“Special care shall be given to forest management practices on forest areas with water protection function, especially drinking water catchment areas, to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.”</i></p> <p>LFCS ST 1002, ch. 5.5.6 <i>“Biologically decomposable oils shall be used in forest machinery as far as it is technically sound and possible. Impairments to waters in forests shall be avoided.”</i></p> <p>Requirements of LFCS ST 1002 5.5.1, 5.5.5. and 5.5.6 cover the PEFC requirement 5.5.4. <b>Conforms</b></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>LFCS ST 1002 5.3.7 <i>“Adequate infrastructure, such as roads, skid tracks or bridges shall be planned, established and maintained to ensure:</i></p> <ul style="list-style-type: none"> <li><i>a) efficient delivery of goods and services;</i></li> <li><i>b) minimisation of damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, threatened or other key species - in particular their migration patterns;</i></li> <li><i>c) minimisation of bare soil exposure, avoidance of introduction of soil into watercourses, preservation of the natural level and function of water courses and river beds, including proper road drainage facilities.</i></li> <li><i>d) Driving off tracks on whole sites shall be omitted on principle.”</i></li> </ul> <p><b>Conforms</b></p>
<p><b>Criterion 6: Maintenance of other socio-economic functions and conditions</b></p>		
<p>5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.</p>	<p>YES</p>	<p>LFCS comment: LFCS ST 1002, ch. 5.6.1 <i>“Forest management planning shall aim to respect the multiple functions of forests to society, have due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socioeconomic functions of forests. Forest management shall comply with labour relating legislation.”</i></p> <p>Literal copy of 5.6.1 and additionally a reference to the obligation of complying with national labor laws <b>Conforms</b></p>

<p>5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.</p>	<p>NA</p>	<p>LFCS checklist: Not applicable: Within the conditions of the Grand Duchy of Luxembourg, the role of long-term health and well-being of “local communities” is a primary role of government at the national level as well as local municipalities. <b>not applicable</b></p>
<p>5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.6.2 <i>“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 should be clarified, recognised and respected.”</i> <b>Conforms</b></p>
<p>5.6.4 Forest management activities shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved or is in dispute there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes</p>	<p>NA</p>	<p>No indigenous people are living in Luxembourg: <b>Not applicable</b></p>

place.		
5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	LFCS ST 1002, ch 5.6.3 <i>“Adequate public access to forests for the purpose of recreation shall be provided taking into account the respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as the compatibility with other functions of the forest.”</i> <b>Conforms</b>
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	LFCS ST 1002, ch 5.6.4 <i>“Sites with recognised specific historical, cultural or spiritual significance, or areas significant for local communities, shall be protected or managed in a way that takes due regard of the significance of the site.”</i> <i>Note: “Plan Sectoriel Paysage” includes important landscape and cultural areas and sites.”</i>  Note with guidance on where to find important landscape and cultural areas <b>Conforms</b>
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	LFCS ST 1002, ch 5.6.8 <i>“ 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 should be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land”</i> <b>Conforms</b>

<p>5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.6.1 <i>“Forest management planning shall aim to respect the multiple functions of forests to society, have due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socioeconomic functions of forests. Forest management shall comply with labour relating legislation. The employment of an appropriate number of qualified forest workers should be maintained or created. External forest enterprises/contractors shall have the necessary qualifications and respect their legal obligations on employment and the wages agreed on. The payment of employees shall depend on qualification and on the basis of valid wage agreements.”</i></p> <p>LFCS ST 1002, ch 5.6.5 <i>“Forest owners, forest managers, contractors, employees and shall be provided with sufficient information and guidance and encouraged to keep up to date through continuous training in relation to sustainable forest management and requirements of this standard.”</i></p> <p>A combination of the two requirements cover the PEFC requirements 5.6.8..</p> <p><b>Conforms</b></p>
<p>5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.6.6 : <i>“Forest management practices shall make the best use of local forest related experience and knowledge, such as of local communities, forest owners, NGOs and local people.”</i></p> <p><b>Conforms</b></p>
<p>5.6.10 Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.</p>	<p>YES</p>	<p>LFCS ST 1002, ch 5.6.9 <i>“Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.”</i></p> <p><b>Conforms</b></p>
<p>5.6.11 Forestry work shall be planned,</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.6.7 <i>“Working conditions should be safe, and guidance and training in safe</i></p>

<p>organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.</p>		<p><i>working practice shall be provided by the employer. Employment of forestry educated staff should be preferred.</i>  <i>Regulations for the prevention of accidents shall be complied with.</i>  <i>Note: Regulation relating to safe working conditions and prevention of accidents is included in Annex 2."</i></p> <p>The requisites of this requirement are in line with PEFC ST 1003:2010 5.6.11.  <b>Conforms</b></p>
<p>5.6.12 Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.6.7 <i>"Working conditions should be safe, and guidance and training in safe working practice shall be provided by the employer. Employment of forestry educated staff should be preferred.</i>  <i>Regulations for the prevention of accidents shall be complied with.</i>  <i>Note: Regulation relating to safe working conditions and prevention of accidents is included in Annex 2."</i></p> <p>The requisites of this paragraph are in line with 5.6.12  <b>Conforms</b></p>
<p>5.6.13 Forest management shall comply with fundamental ILO conventions.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.6.1 <i>"Forest management planning shall aim to respect the multiple functions of forests to society, have due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socioeconomic functions of forests. Forest management shall comply with labour relating legislation.</i>  <i>Note: The Grand Duchy of Luxembourg has ratified all fundamental ILO Conventions and complies with them through national legislation relating to labour issues shown in Annex 2."</i></p> <p>LFCS checklist: Luxembourg has ratified all fundamental ILO conventions (see <a href="http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO::P11200_COUNTRY_ID:102757">http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO::P11200_COUNTRY_ID:102757</a>) and the conventions are thus implemented through the national legislation relating to labour issues (the Labour Code).</p> <p>Requirement 5.6.1 in combination with National law(s) of Luxembourg, complies with PEFC requirement 5.6.13.  <b>Conforms</b></p>

<p>5.6.14 Forest management shall be based inter-alia on the results of scientific research. Forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 5.6.10 <i>“Forest owner shall accept on his/her property forest and environment related research activities carried out by other public institutions”</i></p> <p>Checklist LFCS: Taking into account the socio-economic conditions of Luxembourg, research is primarily carried out by governmental bodies in cooperation with other entities. The role of forest owners, mainly due to their size, in forestry research is rather limited in providing access of those research institutions to their properties.</p> <p>Requirement 5.6.10 obligates the forest owner to accept research carried out by public institutions. <b>Conforms</b></p>
<p><b>Criterion 7: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)</b></p>		
<p>5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.</p>	<p>YES</p>	<p>LFCS ST 1002:2013, ch. 4.2 <i>“Forest owner / manager shall comply with legislation relating to forest management activities.”</i> In Annex 2 of LFCS ST 1002 an extensive list of the LFCS related to the legislation of Luxembourg is provided. This list covers forest management activities, nature conservation, health and safety of workers, workers rights, private ownership, tax payments, international conventions, the use of chemical substances, forest harvesting, deforestation/excessive logging, etc.</p> <p>LFCS ST 1002:2013, ch. 5.1.3, Management plans should be based on legislation as well as existing land use plans, and adequately cover the forest resources. <i>“Management plans or their equivalents, shall respect biotopes listed by Article 17 of the Loi du 29 janvier 2004 concernant la protection de la nature et des ressources naturelles telle qu’elle a été modifiée.”</i></p> <p>LFCS ST 1002:2013, ch. 5.2.9, <i>“The usage of pesticides is only permissible, if there are serious dangers for forest stands or seedlings; and only on the basis of expert advisory; following pesticide producer’s instructions; and in compliance with legislation. Substances covered by the WHO Type 1a and 1b (World Health Organisation) and substances that are not allowed by the legislation shall not be used.”</i></p> <p>LFCS ST 1002:2013, page 19, Note1: <i>“all dangerous substances that are classified by European legislation as harmful to the environment shall be prohibited.”</i></p>



		<p>LFCS ST 1002:2013, ch. 5.6.1 <i>“Forest management planning shall aim to respect the multiple functions of forests to society, have 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. Forest management shall comply with labour relating legislation.”</i></p> <p>LFCS ST 1002:2013, page 20, Note: <i>“The Grand Duchy of Luxembourg has ratified all fundamental ILO Conventions and complies with them through national legislation relating to labour issues shown in Annex 2.”</i></p> <p>Hence, the LFCS clearly states that national legislation is decisive. Secondly, all PEFC aspects (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) are covered. The LFCS conforms to this PEFC requirement.</p> <p><b>Conforms</b></p>
<p>5.7.2 Forest management shall provide for adequate protection of the forest from</p>	<p>YES</p>	<p>LFCS ST 1002, ch. 4.3 <i>“Forest owner / manager shall provide necessary assistance to a law enforcement body in order to ensure protection of the forest from unauthorised and illegal activities</i></p>

<p>unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.</p>	<p><i>of other entities.</i></p> <p><i>Note: Examples of unauthorised and illegal activities are waste disposal, fire opening, use of motor-driven vehicles,, unauthorised logging, etc. Forest owner/manager provides necessary assistance by informing the relevant a law enforcement body, either police or state forest administration.”</i></p> <p>Extra information obtained in the LFCS checklist states that within the socio-economic conditions of Luxembourg, the Government is primarily responsible for protection of forests from illegal activities. Forest owners have no or very limited legal rights to intervene against other entities making illegal activities. Therefore the requirement is focused on “assistance to a law enforcement bodies”, especially informing the law enforcement bodies about any illegal activities.</p> <p>This requirement (4.3) requires the maximum cooperation within the possibilities of the legal rights and responsibilities of Luxembourg.</p> <p><b>Conforms</b></p>
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## 17. PART IV: STANDARD AND SYSTEM REQUIREMENT CHECKLIST FOR CERTIFICATION AND ACCREDITATION PROCEDURES (ANNEX 6)

### 17.1 Scope

This document covers requirements for certification and accreditation procedures given in Annex 6 to the PEFC Council Technical Document (*Certification and accreditation procedures*). Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

### 17.2 Checklist

No.	Question	Reference to PEFC Council PROCEDURES	YES/NO	Reference to scheme documentation
<b>Certification Bodies</b>				

No.	Question	Reference	YES/NO	Reference to scheme documentation
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	YES	<p>See reference LFCS ST 1001, chapter 5, point d): <i>"The separation of standard setting, certification and accreditation processes into independent organisations resolves potential conflicts of interests arising from accumulation of power in the conformity assessment."</i></p> <p>Chapter 6.2.2: <i>"The certification bodies are independent of the development and governance of the scheme."</i></p> <p>For CoC which is fully adopted by the LFCS on 31 July 2013 (see PEFC-LFCS ST 2002:2010 and PEFC-LFCS ST 2002:2013, page 1), the governing body is the PEFC Council. As such, it can be guaranteed that no certifying body has been involved in the governance or decision making procedure of PEFC-LFCS ST 2002:2010 or PEFC-LFCS ST 2002:2013.</p> <p>In chapter 6.2.2 of document LFCS ST 1001: <i>"The certification bodies are independent of the development and governance of the scheme."</i> In chapter 6.1.2 it is mentioned: <i>"PEFC Luxembourg a.s.b.l. is not involved in the certification process or the accreditation process."</i> LFCS ST 1001, chapter 5, point d): <i>"The separation of standard setting, certification and accreditation processes into independent organisations resolves potential conflicts of interests arising from accumulation of power in the conformity assessment"</i>.</p> <p>With these 3 references, the consultant is of the opinion that this PEFC criteria is fully covered by the LFCS: Evidence is given that certification bodies cannot take part in the development or governance of the LFCS, neither for the SFM or for the CoC standard (as described above).</p> <p><b>Conforms</b></p>

No.	Question	Reference	YES/NO	Reference to scheme documentation
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	<p>1) For CoC certification see reference: PEFC-LFCS ST 2002:2010, page 1 &amp; reference PEFC-LFCS ST 2002:2013, page 1.</p> <p>2) For CoC certification: See reference: PEFC-LFCS ST 2003:2012, page 1.</p> <p>1) The LFCS has fully adopted the PEFC requirements for CoC on 31 July 2013 (see PEFC ST 2002:2010 and PEFC ST 2002:2013, page 1). Hence, the LFCS does not have a scheme specific CoC standard.</p> <p>2) Furthermore, the LFCS has also fully adopted PEFC Int. requirements for CB's carrying out CoC certifications (PEFC ST 2003-2012)</p> <p><b>Conforms</b></p>
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	<p>For CoC certification: See reference PEFC-LFCS ST 2002:2010 and PEFC-LFCS ST 2002:2013, page 1.</p> <p>The LFCS has fully adopted PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (see PEFC ST 2003:2012, page 1) .</p> <p><b>Conforms</b></p>
4.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	YES	<p>For SFM certification: PEFC-LFCS ST 1004:2013, chapter 7.3.1: "<i>The certification body shall ensure that the personnel granting the certification has appropriate knowledge and competencies concerning the LFCS scheme.</i>"</p> <p>For SFM certification: PEFC-LFCS ST 1004:2013, chapter 7.4.2: "<i>A list of provided here with auditor competencies regarding: experience, language, content of the LFCS and the PEFC Int. standard, forest related legislation, forest conditions, forestry sector and forestry practices in Luxembourg.</i>"</p> <p>For SFM certification: PEFC-LFCS ST 1004:2013, chapter 7.5.1: "<i>In some cases, a technical expert(s) may be required to support the required auditor competency in a particular technical area by providing appropriate technical expertise.</i>"</p>

No.	Question	Reference	YES/NO	Reference to scheme documentation
				<p>The standard PEFC-LFCS ST 1004:2013 also refers to ISO 17021:2011 as leading document. In this ISO standard (ISO 17021:2011), the same reference is made to external expertise: <i>"The certification body shall have access to the necessary technical expertise for advice on matters directly relating to certification for technical areas, types of management system and geographic areas in which the certification body operates."</i></p> <p>The LFCS conforms to this requirement. This conclusion is based on the references above. <b>Conforms</b></p>
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	<p>See reference: PEFC-LFCS ST 2003:2012, page 1.</p> <p>LFCS has fully adopted PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (PEFC ST 2003:2012, page 1) . <b>Conforms</b></p>
6.	Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management or C-o-C certifications?	Annex 6, 3.1	YES	<p>For SFM certification: PEFC-LFCS ST 1004:2013, chapter 7.4.2, point d): <i>"The auditor shall have sufficient knowledge on the content of the LFCS scheme as well as PEFC scheme for the endorsement of forest certification schemes."</i></p> <p>For CoC certifications: PEFC-LFCS ST 2003:2012, page 1, LFCS has fully adopted PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (PEFC ST 2003:2012, page 1) <b>Conforms</b></p>

No.	Question	Reference	YES/NO	Reference to scheme documentation
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	<p>For SFM certification: LFCS ST 1004:2013, chapter 7.2.1, 7.4.1; 7.4.2 and 7.5.1: A list is provided of competences that auditors shall have. Technical knowhow of Forest Management is also listed. In chapter 7.2.1 a requirement is given regarding competencies with LFCS certification and SFM certification.</p> <p>For CoC certification: PEFC-LFCS ST 2003:2012, page 1. This reference indicates that the LFCS has fully adopted the PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (see PEFC ST 2003:2012, page 1). As such the LFCS conforms to this criteria for CoC certification.</p> <p>No specific reference is found regarding competences in certification procedures/processes in SFM. However, the consultant is of the opinion that this requirement is covered by chapter 7.2.1 of LFCS ST 1004:2013.</p> <p><b>Conforms</b></p>
8.	Does the scheme documentation require that the auditors must fulfill the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	YES	<p>For SFM certification: LFCS ST 1004-2013, chapter 2.1: "<i>The following referenced document is indispensable for the application of this document.: ISO/IEC 19011:2011, Guidelines for auditing management systems.</i>". Furthermore at page 6: "<i>ISO/IEC 19011:2011 provides additional guidance for the auditing of management systems.</i>"</p> <p>For CoC certification: PEFC-LFCS ST 2003:2012, page 1. This reference indicates that the LFCS has fully adopted the PEFC requirements for CB's carrying out CoC certifications (PEFC ST 2003:2012, page 1). As PEFC ST 2003-2012 also adopted ISO 19011, this automatically means that LFCS also conforms to ISO 19011.</p> <p><b>Conforms</b></p>
<b>Certification procedures</b>				
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	<p>For SFM certification: LFCS ST 1004:2013, chapter 7.4.1 and 7.5.1: An extended list of qualification requirements for auditors is given. In case knowledge is lacking on a particular areas, technical experts may be required to support the auditor (see chapter 7.5).</p> <p>For CoC certification: PEFC-LFCS ST 2003:2012, page 1. This reference indicates that</p>

No.	Question	Reference	YES/NO	Reference to scheme documentation
				<p>the LFCS has fully adopted the PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (PEFC ST 2003:2012, page 1). As such the LFCS conforms to this criteria for CoC audits.</p> <p><b>Conforms</b></p>
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	<p>For SFM certification: LFCS ST 1004:2013, chapter 9.1.2: "<i>The certification body shall have documented procedures for determining audit time, and for each client organisation the certification body shall determine the time needed to plan and accomplish a complete and effective audit of the client's operation(s).</i>" Furthermore, all requirements of ISO 17021:2011 apply (see chapter 9.1.1)</p> <p>For CoC certification: PEFC-LFCS ST 2003:2012, page 1. This reference indicates that the LFCS has fully adopted the PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (PEFC ST 2003-2012, page 1). As such the LFCS conforms to this criteria for CoC certifications.</p> <p><b>Conforms</b></p>
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 fulfill or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 4	YES	<p>For SFM certification: LFCS ST 1004:2013, chapter 'Introduction', §4: "<i>This LFCS standard is based on ISO/IEC 17021:2011 and IAF (International Accreditation Forum) documents relating to the application of ISO/IEC 17021:2011; and provides additional requirements necessary for certification and auditing of sustainable forest management within the LFCS scheme.</i>"</p> <p>For CoC certification: PEFC-LFCS ST 2003:2012, page 1. This reference indicates that the LFCS has fully adopted the PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (PEFC ST 2003:2012, page 1). Hence, the LFCS does not have a scheme specific CoC standard. Furthermore, as result of this full adoption of the PEFC requirements the LFCS also adopted the requirements defined in ISO Guide 65.</p> <p><b>Conforms</b></p>
12.	Does the scheme documentation require that applied certification procedures for chain of custody	Annex 6, 4	YES	<p>PEFC-LFCS ST 2003:2012, page 1 with specific reference to ISO 65 at page 6, chapter 0.1, §1., The LFCS has also fully adopted PEFC requirements for CB's carrying out CoC certifications on 31 July 2013 (PEFC ST 2003:2012, page 1). As such, the LFCS'</p>



No.	Question	Reference	YES/NO	Reference to scheme documentation
	certification against Annex 4 shall fulfill or be compatible with the requirements defined in ISO Guide 65?			CoC-certification procedures conforms to the requirements of ISO Guide 65. <b>Conforms</b>
13.	Does the scheme documentation require that applied auditing procedures shall fulfill or be compatible with the requirements of ISO 19011?	Annex 6, 4	YES	The LFCS (LFCS ST 1004) mentions that ISO 19011 provides additional guidance for the auditing of management systems (see chapter 'Introduction', page 5-6). <b>Conforms</b>
14.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4	YES	See reference: LFCS PD 1004, chapter 5, point c.: " <i>Provide PEFC Luxembourg, 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 certificates. The range of data is specified by the PEFC Luxembourg</i> " <b>Conforms</b>
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	In LFCS PD 1003, article 7, point 2, the LFCS mentions that both forest owner/managers (user group B) and forest related industries (user group C) must provide a notification to PEFC Luxembourg after each audit of the on-product use of the logo, which shall be verified by the certifier.  In LFCS PD 1003, article 10, point 2: " <i>The certification body shall have a right to inform PEFC Luxembourg of changes of which it is aware, without consulting the logo user.</i> " <b>Conforms</b>
16.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	YES	For SFM certification LFCS ST 1004:2013, chapter 9.3.1. mentions for surveillance activities the following: " <i>All the requirements given in Clause 9.3 of ISO/IEC 17021:2011 apply.</i> " ISO 17021, ch. 9.3.2.2 requires that " <i>Surveillance audits shall be conducted at least</i>

No.	Question	Reference	YES/NO	Reference to scheme documentation
				<p><i>once a year. The date of the first surveillance audit following initial certification shall not be more than 12 months from the last day of the stage 2 audit."</i></p> <p>For CoC certification: PEFC-LFCS ST 2003:2012, chapter 13.1.1: <i>"The surveillance audits shall be carried out at least annually."</i></p> <p>Chapter 13.1.2 states that an annual surveillance audit must be carried out on the client organisation's site. These yearly on-site visits can be replaced by other yearly audits techniques such as documentation and record reviewing. In all cases, an on-site visit must be carried out at least every two years in case such an alternative audit approach is being used. Such an alternative audit approach is also supported by the PEFC requirements: According to Annex 6, chapter 4 of PEFC specific requirement for certification procedures may be defined.</p> <p><b>Conforms</b></p>
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	<p>For SFM certification LFCS ST 1004-2013, page 5, chapter "Introduction", §4: <i>"This LFCS standard is based on ISO/IEC 17021:2011 and IAF (International Accreditation Forum) documents relating to the application of ISO/IEC 17021:2011; and provides additional requirements necessary for certification and auditing of sustainable forest management within the LFCS scheme."</i></p> <p>ISO 17021, ch. 9.1.1.1 requires that <i>"The audit program shall include a two-stage initial audit, surveillance audits in the first and second years, and a recertification audit in the third year prior to expiration of certification. The three-year certification cycle begins with the certification or recertification decision."</i></p> <p>The LFCS conforms to this requirement with respect to the CoC audit cycles. This conclusion is supported by the fact that the PEFC requirements for CoC-CB's are fully adopted by the LFCS on 31 July 2013 (see PEFC-LFCS ST 2003-2012, page 1).</p> <p>The consultant also considers that the LFCS conforms with respect to the PEFC's 5 years audit requirement for SFM. ISO 17021:2011 is mandatory in the LFCS (see LFCS ST 1004:2013). As ISO 17021:2011 requires an audit cycle of at least 3 years, this means that the LFCS also needs to comply with this 3 year audit cycle. As such the</p>

No.	Question	Reference	YES/NO	Reference to scheme documentation
				LFCS conforms to this PEFC criteria. <b>Conforms</b>
18	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	For SFM certification: LFCS ST 1004:2013, chapter 8.3.: " <i>The certification body shall make publicly available a summary of the certification report, including a summary of findings on the client organisation's conformity with the forest management standard.</i> "  For CoC certification: PEFC-LFCS ST 2003:2012, chapter 12.2.7: " <i>The certification body shall make information on the validity and scope of any issued certification document publicly available</i> " <b>Conforms</b>
19	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	For SFM certification: LFCS ST 1004, chapter 9.2.3.1.3: " <i>The certification body shall consider any relevant information from external bodies, such as governmental bodies, NGOs, etc. that it has received or is aware of and shall use it as audit evidence to determine the client organisation conformity with the certification requirement.</i> "  For CoC certification: According to Annex 4, chapter 4 of the PEFC International standard documentation, this criteria is only applied to SFM. <b>Conforms</b>
20.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	YES	LFCS ST 1004 includes a whole range of requirements additional to Annex 6, e.g. 8.2, 8.4, 9.1.2, 9.2.1.1, 9.2.1.2, 9.2.3.1, 9.2.3.2, 9.2.5, 9.3.2.. <b>Conforms</b>
<b>Accreditation procedures</b>				
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	For SFM certification: LFCS ST 1004:2013, Annex 1: " <i>Certification bodies operating forest management certification according to forest management standards of the PEFC Luxembourg forest certification scheme shall have valid accreditation issued by the accreditation body of the Grand Duchy of Luxembourg (OLAS) or another accreditation body that is a member of the European cooperation for Accreditation (EA) and that complies with ISO/IEC 17011:2004</i> ". ForestSense: According to the above mentioned, the LFCS also allows accreditation bodies that are member of EA but are non-national. However, LFCS PD 1004 mentions in chapter 4.2.1.1: "An entity

No.	Question	Reference	YES/NO	Reference to scheme documentation
				<p>(CB) applying for the notification shall have valid accreditation, issued by a national accreditation body that is a member of the IAF".</p> <p>For CoC certification: See reference LFCS PD 1004:2013, chapter 4.2.2.1: "An entity applying for the notification shall have valid accreditation issued by a national accreditation body which is a member or a part of IAF (International Accreditation Forum). <b>Conforms</b></p>
22.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES	<p>For SFM certification: LFCS ST 1004:2013, chapter 9.2.5.1, point e): "The certification body issues to the group entity a certification document that shall include at least the following information: (e) accreditation mark as prescribed by the accreditation body (including accreditation number where applicable)."</p> <p>For CoC certification: LFCS ST 2003:2012, chapter 12.2.1, point d): "The certification document shall include at least the following information: accreditation mark as prescribed by the accreditation body (including accreditation number where applicable)" <b>Conforms</b></p>
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	<p>For SFM certification: LFCS ST 1004:2013, annex 1: "Certification bodies operating forest management certification according to forest management standards of the PEFC Luxembourg forest certification scheme shall have valid accreditation issued by the accreditation body of the Grand Duchy of Luxembourg (OLAS) or another accreditation body that is a member of the European cooperation for Accreditation (EA) and that complies with ISO/IEC 17011:2004."</p> <p>ForestSense: According to the website of IAF, both OLAS and EA are member of IAF and implement ISO 17011 standards (Management System Certification). Accreditation bodies must either be accredited by OLAS or a member of EA and should comply with ISO 17011.</p> <p>For CoC certification: ISO 17011 is not relevant. <b>Conforms</b></p>

No.	Question	Reference	YES/NO	Reference to scheme documentation
24.	Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?	Annex 6, 5	YES	For SFM certification: LFCS ST 1004, chapter. 5.2: <i>"The certification body shall carry out the forest management certification against the LFCS scheme as accredited certification, i.e. within the scope of valid accreditation described in Annex 1 of this standard"</i> . Annex 1: <i>"The scope of the accreditation shall also explicitly state ISO/IEC 17021:2011"</i>  For CoC certification: Not applicable because the LFCS does not have a scheme specific CoC standard. <b>Conforms</b>
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	For CoC certification: LFCS ST 2003:2012, Annex 1: <i>"The scope of accreditation of CB's shall also explicitly state ISO/IEC Guide 65 this document and other requirements against which the certification body has been assessed"</i> . LFCS ST 2003:2012, chapter 4: <i>"All the requirements given in clause 4 of ISO/IEC Guide 65 and IAF GD5 apply to CB's."</i> <b>Conforms</b>
26.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES	See reference LFCS PD 1004:2013. Consultant: This document describes the procedures for the notification of CB's by PEFC Luxembourg. <b>Conforms</b>
27.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES	See reference LFCS PD 1004:2013. Although no explicit statement is made that all CB's complying with the LFCS requirements may enter the PEFC Luxembourg notification, no evidence have been found regarding discriminatory elements in the notification procedures for CB's. As such the LFCS conforms to this requirement. <b>Conforms</b>

## **18. PART V: STANDARD AND SYSTEM REQUIREMENT CHECKLIST FOR SYSTEM SPECIFIC CHAIN OF CUSTODY STANDARDS –(PEFC ST 2002:2010)**

The PEFC Council's International standard PEFC 2002:2010, Chain of Custody of Forest Based Products, was fully adopted by PEFC Luxembourg, without any modifications on 31 July 2013 (See reference PEFC-LFCS ST 2002-2010, page 1). As such, the LFC standard PEFC-LFCS ST 2002:2010 will not be assessed as it fully conforms to the PEFC requirements.

On 24 May 2013, the PEFC Council adopted a new standard for Chain of Custody of Forest Based Products: 2002-2013. This new standard is also fully adopted on 31 July 2013 by PEFC Luxembourg (See reference: PEFC-LFCS ST 2002-2013, page 1). As such, the LFC standard PEFC-LFCS ST 2002-2013 will not be assessed as it fully conforms to the PEFC requirements.

## 19. PART VI: STANDARD AND SYSTEM REQUIREMENT CHECKLIST FOR SCHEME ADMINISTRATION REQUIREMENTS

### 19.1 Scope

Part VI is used for the assessment of requirements for the administration of PEFC schemes outlined in PEFC 1004:2009, *Administration of PEFC scheme*. Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the standard or the guide. The compliance with these requirements is only evaluated in the first PEFC assessment of a scheme or on specific request by the PEFC Secretariat.

### 19.2 Checklist

No.	Question	Reference to PEFC GD 1004:2009	YES/NO	Reference to application documents
<b>PEFC Notification of certification bodies</b>				
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> ?	Chapter 5	YES	LFCS PD 1004:2013 (Notification of certification bodies). This document covers and conforms to all criteria of chapter 5 of PEFC GD 1004:2009. As such, ForestSense has concluded that the LFCS conforms to this PEFC requirement. <b>Conforms</b>
<b>PEFC Logo usage licensing</b>				
2.	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> ?	Chapter 6	YES	LFCS PD 1003:2013 LFCS ST 2001:2008.  The above mentioned LFCS documents comply and cover with all criteria of chapter 6 of PEFC GD 1004:2009. Hence, ForestSense has concluded that the

				LFCS conforms to this PEFC requirement. <b>Conforms</b>
<b>Complaints and dispute procedures</b>				
3.	Are complaint and dispute procedures in place, which comply with chapter 6 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i> ?	Chapter 8	YES	LFCS PD 1002:2013 (Procedures for investigation and resolution of complaints and appeals). This document conforms to all criteria of chapter 8 of PEFC GD 1004:2009. As such, ForestSense has concluded that the LFCS conforms to this PEFC requirement. <b>Conforms</b>



## ANNEX B: Results of stakeholder survey

A stakeholder survey with 11 questions was conducted from 15.01.2014 to 27.01.2014. Invitations to complete the online stakeholder survey were sent to all participants in the standard setting process via e-mail – this included a total of 17 stakeholders directly involved in the Standard setting process. No e-mails bounced, and 1 reminder e-mail was sent (24-1-2014). There were in total 6 responses (35 % of those contacted), representing forest owners (2), Hunter, hikers and worker representative organisations (1) and other organization (3). At two questions of the survey, a comment was given, but this was not related to the Standard setting process, one response revealed the name, and the other comment stated: *“PEFC is not enough known as well in industrial scenery than by the population. A higher P.R is needed”*

Two responses indicated that the stakeholder representation was only partly representative for the forest management in Luxembourg. No comments were given, on which category or organisations are missing.

When asked if all interested parties were given the possibility to participate and contribute equally to the scheme development and revision most people answered yes, only one person indicated that this was partly the case, no comments available on why this person thought this was the case.

Two respondents (forest owners and managers) believe at least one aspect of the scheme deserve d further considerations, unfortunately no example is given.

One person partly disagreed that consensus was reached in the development of the certification criteria, unfortunately that person didn’t provide information on which part and when in the process.

Everyone agreed on the fact that the organizers provided on time and relevant material to participate in the scheme development and revision. They also agreed on the fact that the development and revision process was well planned and structured.

All respondents were satisfied with the decision making process. According to all, the comments received by the working group/committee were considered in an objective manner. No respondent had an issue or disagreed with the processes during the latest Standard Setting Process. All respondents attended at least one meeting. The consultant added this question to check why people didn’t attend, people who didn’t attend one meeting, unfortunately also didn’t respond to the stakeholder survey.

The result and questions of the survey can be found on the following pages of this document.

## Survey results per question

1. What stakeholder category do you represent?		
Answer Options	Response Percent	Response Count
Forest owners and managers	33,3%	2
Industry and timber trade	0,0%	0
Consumer representatives, users of green spaces (Hunter, hikers) and worker representative Organisations	0,0%	0
Environmental associations	16,7%	1
Research centres and scientific organizations	0,0%	0
Other (please specify)	50,0%	3
<b>answered question</b>		<b>6</b>

2. Did the participating stakeholders represent the range of interest in forest management in your country?		
Answer Options	Response Percent	Response Count
Yes	66,7%	4
No	0,0%	0
Partially	33,3%	2
If not, please specify other interests groups:		0
<b>answered question</b>		<b>6</b>

3. In your view, were all interested parties given the possibility to participate and contribute equally to the scheme development and revision?		
Answer Options	Response Percent	Response Count
Yes	83,3%	5
No	0,0%	0
Partially	16,7%	1
Please provide comments and additional information:		0
<b>answered question</b>		<b>6</b>

4. Did the organizers provide you on time with relevant material (working drafts, meeting minutes etc.) to participate in the scheme development and revision?		
Answer Options	Response Percent	Response Count
Yes	100,0%	6
No	0,0%	0
Partially	0,0%	0
Please provide comments and additional information:		1
<b>answered question</b>		<b>6</b>

5. Did you attend the 4 meetings of the technical committee?		
Answer Options	Response Percent	Response Count
Yes	16,7%	1
No	0,0%	0
Partially	83,3%	5
If not? Please provide comments and additional information:		0
<b>answered question</b>		<b>6</b>

6. Was the development and revision process well planned and structured?		
Answer Options	Response Percent	Response Count
Yes	100,0%	6
No	0,0%	0
Partially	0,0%	0
Please provide comments and additional information:		0
<b>answered question</b>		<b>6</b>

7. In your view were comments received by the working group/committee considered in an objective manner?		
Answer Options	Response Percent	Response Count
Yes	100,0%	6
No	0,0%	0
Partially	0,0%	0
Please provide comments and additional information:		0
<b>answered question</b>		<b>6</b>

8. Was a consensus reached in the development of the certification criteria?		
Answer Options	Response Percent	Response Count
Yes	83,3%	5
No	0,0%	0
Partially	16,7%	1
Please provide comments and additional information:		0
<b>answered question</b>		<b>6</b>

9. Were you satisfied with the decision making process?		
Answer Options	Response Percent	Response Count
Yes	100,0%	6
No	0,0%	0
Partially	0,0%	0
Please provide comments and additional information:		0
<b>answered question</b>		<b>6</b>

10. Do you believe any aspects of the scheme deserve further considerations?		
Answer Options	Response Percent	Response Count
Yes	33,3%	2
No	66,7%	4
Partially	0,0%	0
Please provide comments and additional information:		0
<b>answered question</b>		<b>6</b>

11. Have there been any issues or processes during the latest Standard Setting Process that you disagree with?		
Answer Options	Response Percent	Response Count
Yes	0,0%	0
No	100,0%	6
Partially	0,0%	0
Please provide comments and additional information:		1
<b>answered question</b>		<b>6</b>

## **ANNEX C: Results of international consultation**

PEFCC carried out a sixty (60) day global public consultation period during which all interested stakeholders and the main public was invited to submit comments regarding the LFCS. Comments had to be sent directly to PEFCC. This consultation period started at 19.08.2013 and ended at 19.10.2013.

The consultant was informed on 02.01.2014 by an e-mail from the PEFCC, that no stakeholder comments were received by the PEFCC.

## ANNEX D: Panel of Experts comments

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
General comment	General comment	The assessment report was clear and well structured as well as easy to read (chapters 4-12), but the beginning of the report, i.e. scope, recommendations, executive summary should be improved. Also some considerations on layout are necessary so that findings of the consultant are easy to find.	Some of the text of the report was restructured to improve the readability. However, the chapter structure of the report is fixed: this is a prescribed format by PEFC. Also the details for the content of each chapter is prescribed by PEFC. These guidelines can be found in: PEFC IGD 1007-03-201X (which is part of PEFC GD 1007:2012).
General comment	Acronyms and Abbreviations	This chapter should be in the beginning of the report. Numeral acronyms and abbreviations are missing on this list, i.e. ISO, PD, EUTR, SEBES, hec. (p.23.) ,ha, IAF, ch. , IGD	This is changed. A list of acronyms and abbreviations is now placed at the beginning of the report. Additional abbreviations as proposed by the PoE has been added to the list except SEBES, because this is the name of an organisation.
page 5	Content	Also the final draft report should begin with a couple of short chapters, like: <ul style="list-style-type: none"> <li>• Background</li> <li>• Recommendation</li> <li>• Executive summary</li> </ul> Then already in two minutes the reader understands the message of the whole report.	The consultants understand this remark. However, the PEFC prescribes guidelines for the structure of a conformity assessment report, including the minimum content for each chapter. This is described in the PEFC guideline document: The Assessment Report (PEFC GD 1007-03:2012 , which is part of PEFC GD 1007:2012). The consultant needs to comply with these guidelines.  As a result, the consultant cannot change the structure in the way being proposed by the PoE. However the consultant decided to add background information of LFCS in the Introduction (see chapter 1.1). This gives a clear overview of the development of LFCS at the beginning of the report. The recommendations can be found in chapter

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
			2, in accordance with the PEFC guidelines.
page 4	Content	1 Introduction – is there an intention to have an Executive Summary	No Executive Summary chapter has been added to the Final Report. The structure of an assessment report is prescribed by PEFC (PEFC GD 1007:2012), therefore the consultant will not add an extra chapter to the Final Report.
Ch. 1.1 page 5	The scope of this assessment is to compare the revised “Luxembourg Forest Certification Scheme” (LFCS) against the PEFC Council standard and system requirements. The submitted LFCS has therefore been assessed against the PEFC Council requirements. The report shall form an objective basis for the decision making process of the PEFC Council (PEFC GD 1007:2012). This report has been structured according to PEFC IGD 1007-03:2012 and PEFC Secretariat’s clarification concerning the content of the assessment report (clarification 30/10/12). The assessment will result in a recommendation to the PEFC’s Board of Directors on the re-endorsement of the LFCS.	<p>It would make sense to call the scheme simply “<b>revised LFCS</b>” in the assessment report. What are “PEFC Council system requirements” which are not included in “PEFC Council standard requirements”?</p> <p>Less words mean more understandable text. I would delete all text in red on the left column.</p>	<p>The term ‘revised LFCS’ has been introduced for cases where it is relevant.</p> <p>The term ‘systems’ has been removed to prevent confusion.</p> <p>The consultant has decided to preserve the content and nuances in the text. According to PEFC IGD 1007-03-201X an assessment report must contain certain minimal elements that must be explained in detail.</p> <p>However, the introduction has been restructured and revised by the consultant to make it better readable. Also the list of PEFC documents was removed from this chapter because a same list of PEFC documents is also listed in chapter 1.6.</p>

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
Ch. 1.1 page 5	The following PEFC Standards and Guidelines has been used in this assessment:	<p>The list after the text on the left column is NOT a list of PEFC Standards and guidelines, but a list of assessments which the consultant obviously has done!</p> <p>I prefer to insert one sentence: " In Tables 1 and 2 are listed all relevant documentation used in this assessment." Table 1 could contain PEFC and table 2 PEFC Luxembourg documents! In the report these documents have been listed several times!!</p>	<p>The list has been removed from the introduction. The consultant now refers to chapter 1.5 and 1.6 where a list of both the PEFC documentation and LFCS documentation is given.</p> <p>The entire text in chapter 1.1 has been revised to make it better understandable. The proposed changes by the PoE have been taken into account.</p>
Ch. 1.1 page 5	An assessment of the Chain of Custody standard(s) against PEFC ST 2002:2010 & PEFC ST 2002:2013.	Why against these two standards? Are both of them in force? The ST 2002:2010 cannot be found on <a href="http://www.pefc.org">www.pefc.org</a>	During the LFCS revision process, PEFC ST 2002:2010 was still active. In the meanwhile, PEFC ST 2002:2013 became in force. The consultants were asked to assess compliance with both PEFC versions for the CoC standard (the old PEFC ST 2002:2010 version and PEFC ST 2002:2013 version). As such, a check was made for both versions. LFCS has fully adopted both PEFC versions.
Ch. 1.2 and 1.3 page 6-8	The contents of these chapters	<p>Same matters seem to be dealt in both chapters!</p> <p>The assessment process can be described with far more less words and lines! All details are not necessary in the report; the reader of the report should get an overview of the process and methods of the assessment.</p> <p>- I would prefer to use past tense in reports, now the consultant has used both present and past tense!</p>	<p>The present tense has been removed from the report. All text is now in the past tense.</p> <p>The consultant has decided to preserve the details in the report, as this contributes to the transparency of the conformity assessment and the traceability/repeatability of the assessment process.</p>



Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
Ch. 1.2.6 page 7	The Final Report will then be submitted to the PEFC Council and to PEFC Luxembourg in both .pdf and .doc format	Is this already too detailed information?	This is a PEFC requirement for consultants that carry out conformity assessments. As such, the consultants mentioned this in the report as it contributes to transparency. The consultant decided to preserve this phrase.
Ch. 1.3.1 page 7	First screening of tender documentation	This chapter does not contain any additional information! (same information in 1.3!)	Chapter 1.2 describes the PEFC procedures for the elaboration of an assessment report. These procedures are fixed. Chapter 1.3 describes the assessment process in detail. This chapter is important because it provides details on how the procedures took place in time, which contributes to the transparency of the assessment.
Ch. 1.3.2 page 7-8	The Final Draft Report will be submitted within a target time of 10 weeks after the start of the conformity assessment, which is 20 December 2013 (= day of payment received on bank account of PEFC).	Is this already too detailed information?	This affix was requested by the PEFC. As such this detail was added by the consultant.
Ch. 1.4 page 8	Time table PoEs dead line 24.3.2014	I received this report 28.3. with the recommendation to deliver my assessment by 14.4.! – So what is the relevance to show time tables which are NOT accurate!	The time table has been corrected in the Final Report. Dates are now in accordance with the actual delivery times. The Final Draft report was indeed delivered to PEFC on 28.03.2014, in agreement with all parties (PEFC and PEFC Luxembourg).
Ch. 1.4 page 8		7 Panel of Experts comments – it is never four weeks from the time provided to the PoE panel and the time their report is due with the PEFC Technical Unit If the table is included, make sure the dates	During a consultant training at the PEFC head office in Geneva, it was explained that a PoE commenting period can take up to a maximum of 4 weeks (see PowerPoint Presentation PEFC assessors training 2012-09-05, sheet 61). However, no fixed time for PoE commenting period

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
		are adjusted as required e.g. PoE comments due on 14 April 2014	was found in the PEFC guidelines. This is why the consultant has initially determined a 4 week period for PoE comments. The time table in the Final Report has now been modified according to the two week commenting period. The consultant sent the final draft on 28 March. According to the feedback of the PoE members, they were requested to submit their comments to the PEFC by 14 April. This is a 2 week revision.
Ch. 1.5 and 1.6 page 8-11	Contents of the chapters	These are NOT chapters of a report, but contents of tables! Is it necessary in the report to list all the material received from PEFC Luxembourg? An annex could be used.	The consultant is of the opinion that the list is needed to provide full transparency on the assessment procedure and process. This also means that details must be given about the documentation that has been used in the assessment, from both PEFC and PEFC Luxembourg. One could argue about the location of this information (in an annex or in the main body), but the consultant consider this documentation as essential information of the assessment and as such has decided to leave this information in the main body of the assessment report. To improve readability, the information is now plotted in a table format. The reader can also decide to skip both chapters as it quickly becomes clear what information is provided in these chapters.
Ch. 1.5 page 8	The PEFC International documentation used in the assessment will respectively be: PEFC international standards	Why 2002:2010 and not 2002:2013? 2002:2010 cannot be found on www.pefc.org	This was an error. The error has been corrected in the table. As both PEFC CoC versions have been adopted by the LFCS, no conformity assessment was needed for LFCS's CoC standard. The consultant only verified if both PEFC

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
	<ul style="list-style-type: none"> <li>• PEFC ST 2002:2010, Chain of Custody of Forest Based Products – Requirements.</li> </ul>		CoC versions were adopted by the LFCS, including the most recent version (PEFC ST 2002:2013). This was the case.
Ch. 11.6 page 9	<ul style="list-style-type: none"> <li>• PEFC - LFCS ST 2002:2010 Chain of custody of forest based products - Requirements</li> <li>• PEFC - LFCS ST 2002:2013 Chain of custody of forest based products - Requirements</li> </ul>	Why these two documents, which seem to be identical?	PEFC - LFCS ST 2002:2013 will replace PEFC - LFCS ST 2002:2010. The LFCS's compliance with both CoC versions provides a transition period for CoC users from the old version to the new version. The matter doesn't affect the credibility of the LFCS.
Ch. 2 page 12	Based on the results during this conformity assessment, the assessors of ForestSense conclude that the Luxembourg Forest Certification Scheme conforms to the PEFC Council requirements with the exception of one non-conformity.	Shorter: Based on the results of this assessment, the revised LFCS conforms to the PEFC requirements with the exception of one minor non-conformity.	This has been changed accordingly to:  <i>'Based on the results from this conformity assessment, the consultant concludes that the revised Luxembourg Forest Certification Scheme conforms to the PEFC Council requirements with the exception of one non-conformity.'</i>
Ch. 2 page 12	The assessor recommends the PEFC Council Board of Directors to re-endorse the revised Luxembourg Forest Certification Standard (LFCS) on the condition that the following non-conformity is solved by PEFC Luxembourg:	Should the condition include a time limit?  "Revised LFCS" not "standard"! The identified non-conformity should be expressed more clearly! In annex the consultant proposes that a minimum monitoring frequency should be added in the text.	The consultant has added a time frame in the recommendation of the Final Report for resolving the non-conformity.  Indeed, LFCS stands for Luxembourg Forest Certification <u>Scheme</u> and not for <u>Standard</u> . This is modified in the report.  The non-conformity is re-written to make it better readable and more clear.
Ch. 2 page 12	2. RECOMMENDATION	What level of non-conformity is it? Essential to	Added a statement that the non-conformity is minor.

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
	1st paragraph	be categorised in the recommendation.	
Ch. 2 page12	Para 2, Explanation of non-conformity; see also chapter 3.3 / p. 15, 6 / p. 23; 16.2 / p. 68 / 69	I propose to set a clear timeline to correct the (minor) non-conformity.	The consultant has added a time frame in the recommendation of the Final Report for resolving the non-conformity.
Ch. 3 page 13-16	Content of the chapter	As a "Summary" the content is far too detailed and too long. The summary should not be longer than 2 pages and the structure of the text should point out all relevant findings, i.e. "conforms" or "does not conform" - now in annex there are some non-conformities which are not referred in the report!	<p>The summary has been revised to a certain extend. However, the consultant has decided that omitting too much details will impact the overall quality and nuances of the assessment.</p> <p>This was an error: In checklist in the annex, should contain only 1 non-conformity. The consultant found two conformities that were still indicated as non-conform in the reference column. The text in the reference column was changed to 'conforms'.</p>
Ch. 3.5 page 15	3.5 Chain of custody standard(s)	What evidence has been used to show the adoption by PEFC Luxembourg?	<p><i>"The PEFC CoC standard (PEFC ST 2002:2010, including the most recent version PEFC ST 2002:2013) has been fully adopted by PEFC Luxembourg on 31 July 2013, as stated on the title page (page 1) of scheme documents PEFC/LFCS ST 2002:2010 and PEFC/LFCS ST 2002:2013. As such, the LFCS fully conforms to the PEFC requirements for CoC and it is not relevant to summarize the scheme design."</i></p> <p>This clarification has now been added in the Final Report.</p>
Ch. 3.6 page 15	3.6 Logo Usage	<p>What evidence has been used to show the adoption by PEFC Luxembourg?</p> <p>Also, what document has been adopted – need to quote in the same way as 3.5</p>	<p><i>"The PEFC Logo Usage Rules (PEFC ST 2001:2008) have been fully adopted by the PEFC Luxembourg on 31 July 2013, as stated on the title page (page 1) of scheme document PEFC/LFCS ST 2001:2008. As such, the LFCS fully conforms to the PEFC requirements for Logo Usage and it is not relevant to summarize the scheme design."</i></p>

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
			This clarification has now been added in the Final Report.
Ch. 4 page 17	Content of the first and second chapters	I do not understand the content of the chapter, or the idea of its presence. What is the message? The heading of the chapter is "General structure"	The presence of this chapter is a prerequisite of PEFC. According to the PEFC guidelines (see PEFC IGD 1007-03-201X) an assessment report must contain a chapter explaining the structure of a national scheme and other aspects that may affect the credibility en efficiency of the scheme (the way it is organised, quality of the organisation, the governing of the scheme, etc.). This prerequisite was also explicitly mentioned in the tender that was submitted by PEFC for the assessment of the LFCS (see chapter 2.11 of the tender). All this is explained in chapter 4 of the assessment report.
Ch. 5 page 19-22	5. STANDARD SETTING PROCESS 12 <sup>th</sup> paragraph  15 <sup>th</sup> paragraph	Also, in regards to the voting, this assumes that the votes from the TC meeting stood while seeking clarification by postal ballot of further votes. It appears that the question did not fit the analysis as some organisations attended some meetings whereas question seeks to know if they attended <u>all</u> meetings  Last sentence - Did the approval mechanism cover the PEFC/LFCS STs as well?	To the question: "Did you attend the 4 meetings of the technical committee?" there were 3 possible answers: Yes, No or Partially. The consultant assumes that a person who never came to a meeting would answered 'No' and people that attended a few of the four meetings would answered 'Partially'.  Reference is unclear. But indeed, the approval mechanism also covers LFCS ST's (Standards).
Ch. 5 page 22 Ch. 6 page 24 Ch. 9 page 28	Observations on communication errors and typos	Are these necessary in the report?	No, this it is not necessary. The consultant has included this because it will contribute the quality of the scheme. An errorless scheme contributes to the overall trust in the capabilities and quality of PEFC Luxembourg as a governing body of the LFCS.
Ch. 8 page 27	8. CHAIN OF CUSTODY STANDARD	For the two PEFC-LFCS ST's – presume that	This is indeed the case. PEFC Luxembourg fully adopted the

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
		these are copies of PEFC ST but branded under the LFCS?	PEFCC CoC standard; both the older 2010 version as well as the newest 2013 version (PEFC ST 2002:2013). Both versions were fully adopted by PEFC Luxembourg on 31 July 2013 (see PEFC/LFCS ST 2002-2010 & PEFC/LFCS ST 2002-2013) and, as the PoE mentions, 'branded' under the LFCS.
Ch. 10 page 29	10. PROCEDURES FOR ISSUANCE OF LOGO LICENSING 2 <sup>nd</sup> paragraph 5 <sup>th</sup> paragraph  6 <sup>th</sup> paragraph	1 <sup>st</sup> dot point – See 8. which has a date for the adoption – would be worthwhile having a date for this document  Last sentence - also, doesn't this contradict the first paragraph i.e. PEFC logos issued by PEFC national governing bodies (in this case, PEFC Luxembourg) id. – this should be in full!	Date for adoption has been added to PEFC –LFCS ST 2001:2008.  Changed to: For entities that are covered by a multi-site cross-country CoC certificate with a central office located outside the Grand Duchy of Luxembourg, the CoC certificate must be issued by a certification body that is notified by the respective PEFC authorized national body of the country where the central office is located.
Ch. 11 page 30	11. CERTIFICATION AND ACCREDITATION ARRANGEMENTS 5 <sup>th</sup> paragraph	Would prefer to see the definitive statement as used in the last paragraph of 9 or 10	A definitive statement has been made about the conformity of the LFCS with respect to the certification and accreditation procedures.
Ch. 13 page 32	No distinction is made between minor and major non-conformities.	in annex p. 69 : "(Minor) Non-Conformity" in annex p. 46 : "Non-Conform" There seems to be distinction!	The consultant agrees with this observation. . All <u>non-conformities</u> statements have been changed to <u>minor non-conformities</u> statements.
Annex, part II page 69	The assessor does not agree with the argumentation that forest monitoring frequency cannot be defined due to differences in forest area and type of ownership: At least a minimum monitoring frequency should be	I do agree with the consultant on this matter,	Noted by the consultant. PD: The minor non-conformity has been preserved.

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
	mentioned to enable the auditors to verify sustainability of the forest management and to verify compliance with the forest management plans. <b>(Minor) Non-Conformity</b>		
Ch. 10 page 29	Multisite: In the third from last paragraph it is mentioned: The certification body that issues the license is notified by PEFC Luxembourg. For entities that are covered by a multisite cross-country CoC certificate the logo license must be issued by a certification body that is notified by the respective PEFC authorized body.	For clarification: Is it correct that in these cases the logo license is issued by the certification body and not by the PEFC national governing body?	<p>The text contained an error. The explanation is as follows (also adapted accordingly in the Final Report): For entities with a multi-site CoC certificate and a central office in the Grand Duchy of Luxembourg the CoC certificate must be issued by a certification body that is notified by PEFC Luxembourg. In that case, PEFC Luxembourg will issue the logo license and the logo use contract with the applicant (certificate holder).</p> <p>In case where the entity is covered by a multisite cross-country certificate with a central office located outside the Grand Duchy of Luxembourg, the CoC certificate shall be issued by a certification body that is PEFC notified by the respective PEFC authorised body or by the PEFC Council. Based on this, PEFC Luxembourg can then issue the PEFC Luxembourg Logo license based on this certificate.</p> <p>Hence in all cases, PEFC Luxembourg is the only entity that is entitled to issue logo licenses of PEFC Luxembourg.</p>
page 50	14. PART I 5.6 a) Process	On what date was the public consultation announced?	This was on the 6 <sup>th</sup> of May. The text has been adjusted.
page 68	16. PART III	5.1.3 uses the term 'periodically' – does it	The PoE probably refers to 5.1.4 with this remark as the

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
	4.1 b)	<p>come under the same consideration for this question?</p> <p>Why has the Consultant introduced 'forest plantations' into the discussion of this question?</p>	<p>term 'periodically' is not used in criteria 5.1.3.</p> <p>Unclear why the PoE refers to the term 'forest plantation' in this criteria, as this term was not used here. In another criteria, this term has indeed been used, but this has been replaced by the term 'forest area'.</p>
page 70	16. PART III 5.1.1	The listing of "chapters" by number seems at odds with the responses to other questions where the text from the "chapter" is provided in full – as a standalone document, the full text is required for evidentiary purposes	The LFCS already conforms to the statement; the extra listing is to illustrate that there are more requirements contributing to the multipurpose goals of a forest.
Ch. 16.2 page 71 & 76	5.1.4 and 5.2.2 YES (Conforms)	There should be at least a reference to the non-conformity in 4.1.b on page 68 / 69 as these are the two chapters in question where a clear definition of "periodically" is missing.	Both PEFC criteria are literary copied into the LFCS (LFCS ST 1002). As such they are fully conform to the PEFC criteria. A reference to 4.1 b. has been made in 5.1.4 and 5.2.2.
Ch. 16.2 page 72	5.1.6: Public forest owners (both state and communes) represent 44 % of forests Those forest are public and their managers are accountable and answerable to the public and their elected officials. It is generally assumed, following the European legislation on free access to information that information kept by public bodies are accessible to the public upon request.	Is there any legal requirement that public forest owners have to make available a summary of a forest management plan or its equivalent? If yes this should be mentioned here to support the arguments listed.	<p>Response from PEFC Luxembourg to ForestSense: The right of public access to environmental information in Luxembourg is stipulated in law:</p> <p><i>Loi du 25 novembre 2005 concernant l'accès du public à l'information en matière d'environnement.</i></p>
page 74	16. PART III	'... no conversion is done at all ...' – can't	The argumentation for the conformity statement has been



Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
	5.1.11	conclude this as 5.1.8 isn't a 'shall' statement but only 'in principle' and allows for exemptions. Conversion can be minimised and regulated, if it is done at all!	modified.
Ch. 16.2 page 76	5.2.4: Requirement: Forest management planning shall make use of those policy instruments set up to support these activities. Reference to scheme documentation: Forest management planning should make use of those policy instruments set up to support these activities.	The requirement states "shall" and the reference states "should" which is a difference in terms of obligation; does this fact justify an observation / remark or is nevertheless a full conformity given?	The consultant agrees with this observation. The wording 'should' indeed provides room for a different interpretation and is less enforcing than the wording 'shall'. Almost throughout the entire LFCS for sustainable forest management (LFCS ST 1002) the wording 'shall' is being used for monitoring and sustainability related issues (see chapter 5 of LFCS ST 1002). The first part of the reference in chapter 5.2.3 is also using the wording 'shall'. Also, from the overall perspective, the LFCS has a strong focus on sustainable forest management: The scheme complies with all other sustainability criteria and is very elaborate on sustainability measures. From this perspective the consultant is of the opinion that the used wording 'should' is not a reason to make this requirement non-conform. On the other hand, the consultant will make a notification of this wording and request PEFC Luxembourg to correct this (see chapter 6 of the assessment report).
page 99	16. PART III 5.7.1	I'm not convinced that the Consultant has provided adequate evidence of LFCS conformance with the PEFC requirement	The argumentation for conformity has been modified by the consultant. The LFCS still conforms to this PEFC criteria.
page 98	16. PART III Criterion 7	Is this the correct text for Criterion 7 – please look at text for Criterion 5 on Pg 91 – can't be the same for both!	The text of the both criterions are copied from GD 1007-2012 p19,p21 and are the same for both.

Report chapter / page (Final Draft Report)	Consultant's report statement	PoE member comment	Consultant's response
page 101-103	17. PART IV 2, 3, 5 & 6	In regards to the CoC certification discussion – haven't extracted the relevant text as evidence when it has been done for virtually all other PEFC requirements.	Since the LFCS has fully adopted the PEFC requirements for CoC, the consultant is of the opinion that specific referencing is not relevant.
page 105	17. PART IV 13	The response seems to relate to ISO 17021 <u>NOT</u> ISO 19011 – please review in context of the PEFC question (see section 8)	This was indeed the incorrect reference. It has been changed to: The LFCS (LFCS ST 1004) mentions that ISO 19011 provides additional guidance for the auditing of management systems. (see chapter 'Introduction', page 5-6). Conforms.
Ch. 17.2 page 106-107	Requirement 16, Reference to scheme documentation: However, at chapter 13.1.2 it is mentioned that an annual surveillance audit can be replaced by other audits techniques, which shall not exceed 2 years.. According to Annex 6, chapter 4 of PEFC International specific requirement for certification procedures may be defined.	What is meant by "other audit techniques, which shall not exceed 2 years"? Is there an exemption of the annual surveillance mode? If yes, what is the exact reference in Annex 6, chapter 4?	The LFCS requires an annual audit that must be carried out at the client organisation's site. The LFCS also provides an alternative auditing approach for client organisations that show a solid track record, is transparent in its administration, has a low risk profile or is a micro enterprise (see LFSC ST 2003, ch. 13.1.2, points a. to e.). In such cases the on-site visit may be replaced by for example a documentation or record review. Such an alternative approach (e.g. desk-top audit) must in all cases also being carried out at an annual basis. In case an alternative audit is being applied, the LFCS nevertheless requires that at least every 2 years an on-site visit is being carried out. This alternative approach is still conform to the PEFC requirement 16.
page 107	17. PART IV 20	With the weight of evidence it must Conform but no assessment has been made!	As indicated, this requirement is not taken into account in the PEFC conformity decision making. As such the consultant decided to only referring to the document references. A second reason for this is that the number of additional requirements are substantial.

## ANNEX E: List TC members

Stakeholder Group	Member organization		Representatives
<b>Project leader</b>	PEFC Luxembourg		Michel Dostert
<b>A - Forest Owners and Managers</b>	Administration de la Nature et des Forêts	State forest administration	Carole Sinner Frank Volter
	Groupement des Sylviculteurs	Private forest owners association	Hubert de Schorlemer Winfried von Loe, Georges Glesener
	ProSilva Luxembourg	Professional forestry organisation	Serge Reinardt
<b>B - Processors</b>	Association des Patrons Menuisiers	Association of Wood processors	Lynn Kauffmann
	Chambre de Commerce		Laurent Koener
	Kronospan + Imprimerie Reka	Processing company, Printing company	Jean-Marc Bintner Marx Uwe
<b>C – Forest Users</b>	Ministère de l’Agriculture/SEBES	Ministry of Agriculture, Water management company	Daniel Frieden Christian Schroeder
	Natur&Emwelt	E-NGO	Claudine Felten
	FSHCL	Hunting organization	Gaby Poeckes-Majerus

## ANNEX F: Stakeholders invited to online survey

The table below shows the list of 18 stakeholders (individual persons) that received an invitation for the online survey, carried out by ForestSense:

Stakeholder name / organization	Family name	First name	Email
Administration de la Nature et des Forêts	Sinner	Carole	<a href="mailto:carole.sinner@anf.etat.lu">carole.sinner@anf.etat.lu</a>
Administration de la Nature et des Forêts	Wolter	Frank	<a href="mailto:frank.wolter@anf.etat.lu">frank.wolter@anf.etat.lu</a>
Association des Patrons Menuisiers	Kauffmann	Lynn	<a href="mailto:l.kauffmann@fda.lu">l.kauffmann@fda.lu</a>
ProSilva Luxembourg	Serge	Rheinhard	<a href="mailto:s.reinardt@me.com">s.reinardt@me.com</a>
Natur&Emwelt	Felten	Claudine	<a href="mailto:c.felten@naturemwelt.lu">c.felten@naturemwelt.lu</a>
Fédération St-Hubert des Chasseurs du Grand-Duché de Luxembourg	Poekes-Majerus	Gaby	<a href="mailto:gpoeckes@pt.lu">gpoeckes@pt.lu</a>
Kronospan	Marx	Uwe	<a href="mailto:u.marx@kronospan.lu">u.marx@kronospan.lu</a>
Chambre de Commerce	Koener	Laurent	<a href="mailto:laurent.koener@cc.lu">laurent.koener@cc.lu</a>
Ministère de l'Agriculture, de la Viticulture et du Développement rural	Frieden	Daniel	<a href="mailto:daniel.frieden@ma.etat.lu">daniel.frieden@ma.etat.lu</a>
Groupement des Sylviculteurs	de Schorlemer	Hubert	<a href="mailto:hdes@pt.lu">hdes@pt.lu</a>
Imprimerie Reka	Bintner	Jean-Marc	<a href="mailto:jean-marc.bintner@reka.lu">jean-marc.bintner@reka.lu</a>
Winfried	v. Loe	Winfried	<a href="mailto:w.loe@privatbesch.lu">w.loe@privatbesch.lu</a>
Glesener	Glesener	Georges	<a href="mailto:georgesglesener@hotmail.com">georgesglesener@hotmail.com</a>
Crochet	Crochet	Jos	<a href="mailto:jos.crochet@internet.lu">jos.crochet@internet.lu</a>
SEBES	Schroeder	Christian	<a href="mailto:christian.schroeder@sebes.lu">christian.schroeder@sebes.lu</a>
Administration de la Nature et des Forêts	Philippe	Fisch	<a href="mailto:philippe.fisch@anf.etat.lu">philippe.fisch@anf.etat.lu</a>
Consultant to PEFC Luxembourg	Tymrak	Jaroslav	<a href="mailto:tymrak@tj-consult.com">tymrak@tj-consult.com</a>
Projectleader TC	Dostert	Michel	<a href="mailto:m.dostert@privatbesch.lu">m.dostert@privatbesch.lu</a>