
Final Report

Conformity Assessment of the revised Danish Forest Certification Scheme



December 2012

Client

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ACRONYMS

CoC	Chain of Custody
DFCS	Danish Forest Certification System
FM	Forest management
FSC	Forest Stewardship Council
GD	Guiding Document
GL	Guideline
GLI	Guideline (internal purposes)
ha	Hectare
IAF	International Accreditation Forum
ILO	International Labor Organization
ISO	International Organization for Standardization
MCPFE	Ministerial Conference on the Protection of Forest in Europe
MRC	Minimum Requirements Checklist
PEFCC	Programme for Endorsement of Forest Certification Schemes Council
PEFC DK	PEFC Denmark
PEOLG	Pan-European Operational Level Guidelines
SFM	Sustainable Forest Management
SSP	Standard setting procedure
TD	Technical Document

1. INTRODUCTION

This report describes the results of the evaluation of the Danish PEFC Certification Scheme for Sustainable Forest Management (DFCS) against the PEFC Council (PEFCC) requirements for forest certification schemes. The PEFCC appointed Form international (Form) as the independent consultant to carry out the study. This assessment report will be the basis for the PEFCC's decision on the formal endorsement of the Danish PEFC Certification Scheme for Sustainable Forest Management.

The assessment benefited from Form's specific experience and expertise in Forest Certification and Sustainable Forest Management (SFM). Form has implemented many studies in which national or international certification standards were analyzed against another standard or scheme, for example for FSC, Keurhout and the Dutch system called BRL (now TPAC). Form has also carried out several conformity assessments for PEFC, such as the standards of Austria, Spain, Gabon, Czech Republic, Finland, Sweden, Canada, Switzerland, Canada, Ireland and the United Kingdom.

This report is the final report, in which the comments and views of PEFC Denmark and the Panel of Experts have been considered.

1.1 Scope of the assessment

The scope of this assessment is to compare the DFCS with the minimum requirements of PEFCC, by verifying the scheme against PEFCC's standards and guiding documents and the Minimum Requirement Checklist (MRC), version GL2/2011.

1.2 Assessment process

The assessment process went through the following steps:

- **Review of the documentation**

The PEFC DK documentation has been reviewed by three consultants of Form, mentioned in chapter 1.5. The assessment was carried out against the final DFCS that was adopted by the Board of PEFC Denmark in March 2012.

- **Verification of the checklist**

PEFC Denmark's documentation was assessed against the PEFCC MRC, version GL 2/2011

- **Public consultation**

The international public consultation was held from 8 Jun 2012 to 7 Aug 2012. Comments of the public were considered in the process. Form sent out questionnaires to 35 stakeholders that were invited to participate in the standard setting, 11 of which participated in the working groups. In total, 9 responses have been received to the questionnaire (26% response). The responses

confirmed that standard setting processes have followed PEFC's required procedures for a number of key elements such as working group formation and decision making based on consensus.

- **Drafting of the interim report.**

This interim report was sent to PEFC Denmark and PEFC on 16 October 2012.

- **Review of interim report.**

PEFC Denmark reviewed the first interim report and submitted new information and changes to their scheme documentation on 31 October 2012. Changes have been made to the scheme documents listed in the first table in section 1.4 with the indication **revoct** (revision October). PEFC Denmark's comments on the first interim report and a description of their corrective actions can be found in annex 3.

- **Drafting of the second interim report**

Form reviewed the new information and changed documentation that PEFC Denmark submitted. This second interim report was sent to PEFC and PEFC Denmark on 11 December 2012.

- **Review of the second interim report**

The Panel of Experts carried out an evaluation of the second interim report and FORM received their comments on 19 December 2012.

- **Final analysis and reporting**

The report was delivered on 21 December 2012, taking into account the comments provided by the Panel of Experts. The comments and FORM's response to the comments can be found in Annex 4.

1.3 Methodology adopted

The methodology, which Form proposed in the tender document, was used for the conformity assessment. The report was written in line with the guidelines of PEFC Council for the content of an assessment report.

The work consisted of a desk study in which an evaluation of the conformity was conducted. This assessment enabled the consultants to get an insight into the similarities and differences between the DFCS documentation and the minimum requirements of PEFC, as well as into any missing information.

a) **Assessment of the standard setting procedure**

This aspect is evaluated on the basis of the information presented in Part I of PEFC's MRC. The checklist was used to assess the compliance of DFCS with the demands of PEFC concerning the standard setting procedure, PEFC ST 1001:2010.

The criteria for the standard setting procedure are assessed in two stages. The assessment of the standard setting is based on:

1. the compliance of the scheme documented procedures ('Procedures')

2. compliance of the standard setting process itself ('Process')

The documented procedures are required to govern the standard setting process and as such shall be in place before the standard setting process starts.

b) Assessment of the certification standards

A comparison was conducted between the requirements for forest management in PEFC ST 1003:2010 as approved by PEFC and the DFCS Standard.

c) Assessment of the Chain of Custody standard

The PEFC Council procedures for Chain of Custody certification PEFC ST 2002:2010 were integrally adopted by PEFC Denmark.

d) Assessment of the certification and accreditation procedures

For forest management these procedures were assessed on the basis of the information presented in part VII of the PEFC Council MRC and chapter 8 and Annex 6 of the PEFC Technical Document.

For certification and accreditation procedures for Chain of Custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

e) Assessment of the complaints and dispute resolution procedures

These procedures were assessed on the basis of requirements presented in chapter 8 of PEFC GD 1004:2009, Administration of PEFC scheme.

f) Other aspects regarding functions and efficiency of the scheme

The functions were evaluated on the basis of the description and analysis of these functions, as indicated in the information obtained from and in correspondence with PEFC Denmark.

1.4 Documents / resources

The PEFC Denmark documents that Form international used for the conformity assessment:

Document	Title
Application letter	PEFC Denmark Application
Development report	Report on the Danish Certification System technical document revision process
GL 2/2011	PEFC Council Minimum Requirements Checklist
The Danish PEFC Certification Scheme for sustainable forest Management revoct	Description the structure of the Danish PEFC certification system (Danish Scheme doc)
PEFC DK 001-3 revoct	PEFC Denmark's Forestry standard
PEFC DK 003-4 revoct	PEFC Denmark's Requirements for group certification of sustainable forest management
PEFC DK 005-3 revoct	PEFC Denmark's Requirement for certification and accreditation procedures
PEFC DK 006-2	PEFC Denmark's requirements for notification of certification bodies
PEFC DK 007-2	Terms and definitions
PEFC DK 008-2 revoct	Procedure for development and revision of the Danish PEFC certification scheme – rev 2
PEFC Denmark's statutes	PEFC Denmark's statutes
DFA	The Danish Forest Act
Account of public comments with PEFC DK response	Hørringsvarsamlet_PEFC bemærk2
Revised draft standard after public consultation	PEFC DK 001-X SkovstandardUDKAST4
List of unresolved issues during the final draft version	Udeståender
Minutes working groups	Minutes working groups
Minutes board meetings	Minutes board meetings
PEFC DK comments to the interim report	PEFC DK comments to the interim report

The PEFC Technical documents which Form used:

#	PEFC Council document	Date
1.	PEFC Council Technical Document (TD)	5 October 2007
2.	PEFCC TD Annex 1: Terms and Definitions	27 October 2006
3.	PEFCC TD Annex 6: Certification and Accreditation Procedures	5 October 2007
4.	PEFCC TD Annex 7: Endorsement and Mutual Recognition of National Schemes and their Revisions	5 October 2007
5.	PEFC ST 1001:2010 Standard Setting – Requirements	26 November 2010
6.	PEFC ST 1002:2010 Group Forest Management Certification – Requirements	26 November 2010
7.	PEFC ST 1003:2010 Sustainable Forest Management – Requirements	26 November 2010
8.	PEFC ST 2001:2008 v2 PEFC Logo usage rules - Requirements	26 November 2010
9.	PEFC ST 2002:2010 Chain of Custody of Forest Based Products - Requirements	26 November 2010
10.	The PEFC Council Minimum Requirements Checklist for Certification Scheme Applications and references (GL 2/2011)	26 May 2011
11.	PEFC GD1004:2009, Administration of PEFC scheme	5 October 2009
12.	GLI 6/2005 (<i>Content of the Consultant's Assessment Report for Forest Certification Schemes</i>)	27 January 2005
13.	PEFC ST 2003:2012, Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard	16 July 2012

Internet resources used:

- www.pefc.org
- www.ilo.org
- www.iso.org
- www.pefc.dk

1.5 Personnel

This conformity assessment was undertaken by Rik Sools (Senior Forestry Expert), Petra Westerlaan (Forestry Expert) and Marthe Tollenaar (Forestry Expert).

2. RECOMMENDATION

Based on the results of this conformity assessment, Form international recommends to the PEFC Board of Directors to re-endorse the Danish Forest Certification Scheme, provided that the found non-conformities are resolved.

3. SUMMARY OF THE FINDINGS

3.1 Overall

The Danish Forest Certification Scheme (DFCS) is in general quite complete and comprehensive. However, a few non-conformities have been identified. Most noteworthy is that two of the forest management indicators lacked detail. Their text does not cover the requirement fully.

PEFC DK adopted the PEFC International procedures for CoC certification, logo usage rules and certification and accreditation of CoC certification. This is compliant with PEFC requirements.

Some minor non-conformities have been identified for group certification procedures and complaints and dispute resolution procedures for scheme administration.

In the following sections of this summary the non-conformities that have been found during this conformity-assessment have been listed per scope. All sections with quotation marks are cited PEFC DK documents or cited PEFC DK comments. All sections without quotation marks are comments made by Form.

3.2 Standard Setting Procedures

The standard setting procedures and implementation process have been found to be fully compliant with the requirements. No non-conformities were identified.

3.3 Group Certification Procedures

Req. 4.1a: 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

PEFC DK 007-2, section 2: "Group certification of forest management: Certification of forest management of a group of small and medium sized forest owners under one certificate."

PEFC DK 003-4, section 5.5: "The group leader shall describe the structure of the organisation in relation to the activity as a group administrator, for example in an organisation chart. Procedures, roles, rights and duties for the work as a group leader shall be defined and distributed by the group leader. The management shall provide the necessary resources in order to carry out the work."

The requirement demands a clear definition for group organization and this is not present in the standard. Also, there is no figure showing the relations between group leader, participants and organization, like in the PEFC International standard, so this cannot serve as a substitute. For clarity purposes the group organisation shall be defined.

Does not conform

3.4 Forest Management Standard (FMS)

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.

Requirements for individual forest properties are as follows:

PEFC DK 005-3, section 6.4.4: "The certification report must include:

- A summary of the hearing of stakeholders
- A summary of the report that includes:
 - Main data
 - Management objectives as required in section 7.4.1 of "PEFC Denmark's forest management standard – PEFC DK 001-3"(only individually certified forest properties)
 - Any deviations

Confidential and personal information may be excluded from the summary. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these.

The summary of the certification report shall be made available to the public by the certification body"

For group certified entities the requirement has been added to the responsibility of the group leader and required to be accepted by forest owners:

PEFC DK 003-4, section 5.3: "Group leaders administer and organise group certification of forest properties. In doing so the group leader shall carry out the following functions:

- ...
- Upon request from stakeholders, provide a summary of the individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard. Confidential and personal information may be excluded. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these."

PEFC DK 003-4, section 6: "By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum:

7) Upon request from stakeholders, the group leader to provide a summary of the individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard."

Both the requirements for individual properties and group certified properties do not comply with the minimum requirement for a number of reasons:

- For individual properties the required summary regards the certification report, not the management plan. It is not acceptable that the auditor is the only responsible for

publishing the public summary of the management plan, because it is the same auditor that has to verify the conformity of this requirement. This would cause a circular verification process as the auditor would have to check himself. This is not auditable.

- For both individual and group certified properties PEFC DK requires as a minimum that management objectives are included in the summary. This is not according to the requirement that the summary shall be appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied.

Does not conform

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.

PEFC DK 001-3, section 7.3.3: “The forest owner and his employees shall be ready to enter into a dialogue with users and the local community aiming i.e. at ensuring a reasonable:

- Planning and exerting of recreation in the forest.
- Utilization of knowledge about the natural and cultural history of the forest.”

No requirement was found for mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.

PEFC DK states that: “Due to § 62 in the Forest Act anyone with a significant interest in a case is entitled to complain to the Natural and Environmental Appeal Board. The Natural and Environmental Appeal Board is an independent complaints authority for administrative decisions within the plan, nature and the environment areas.

§§ 60 – 64 in the Forest Act gives the more detailed rules for handling complaints.

While the same possibilities for complaints are given in the Nature Protection Act (§§ 78-87).

The possibility for complaining within the plan, nature and the environment areas is often used and decisions of the Board are used in the administration of laws.”

Although these legal possibilities for appeal may play a role in some cases, it is in the spirit of this requirement that complaints and disputes are solved as much as possible at the level where they occur, i.e. between manager and local people. Including a government authority is a possible next step.

A mechanism ‘above’ the forest management level is acceptable in case it can functionally serve the purpose of effective communication and consultation with local people and other stakeholders relating to sustainable forest management and for resolving complaints and disputes relating to forest management between forest operators and local people.

The mechanism cited by PEFC Denmark can only serve partly to cover the requirement, because the mechanism relates to appeals regarding administrative decisions taken by the government and issues under the jurisdiction of the government. Any other issues, including private to private complaints, are not covered under the scope of the cited mechanism. Also, there is a missing link in the chain of events before arriving at an appeal. Appeals are made against formal decisions, whereas a complaint or dispute does not need to be a reaction to a formal decision. The missing link is the complaint and dispute resolution mechanism relating to forest management between forest operators and local people.

Does not conform

3.5 Certification and Accreditation Procedures

No non-conformities have been found for certification and accreditation procedures for forest management as laid down in PEFC DK 005-3.

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

3.6 Complaints and Dispute Resolution Procedures

Req. 2d: Does the complaint procedure provide for appropriate corrective and preventive actions?

PEFC DK Statutes, §7:

"§7 Appeal Committee

7.1 The Board of PEFC Denmark has the overall responsibility to handle and solve disputes and complaints related to certification under the Danish scheme, which cannot be solved by the certification bodies' or accreditations bodies' own procedures."

No reference is found that PEFC Denmark will use the experience and outcomes of complaint and dispute procedures to formulate appropriate corrective and preventive actions.

Does not conform

4. ANALYSIS OF THE DANISH FOREST CERTIFICATION SCHEME

PEFC Denmark describes itself as a membership-based, self-governing and legally independent association, which owns and is responsible for the development, administration and maintenance of the Danish scheme. The organisation is governed by the board, daily management is carried out by the secretariat and annually a general assembly of members is held. Temporary working groups are installed to carry out specific tasks.

An important example of temporary working groups are the two groups for standard setting and revision of the Danish Scheme, which has taken place for the second time between 2010 and 2012. PEFC Denmark was established in 1999 with the first scheme being endorsed by PEFC in 2002 and the first revised scheme in 2007. Currently, the Danish Scheme is going through its second revision.

The Danish Scheme aims to promote sustainable forest management in Denmark and is based on the current situation in the Danish forest sector, relevant national legislation and the requirements set by PEFC International. The scheme is built up out of seven normative documents, one descriptive document and two organisational documents, all of which have been considered in the current conformity assessment.

PEFC Denmark provides systems for individual and group certification, thus aiming to enable small and larger forest owners to be certified in a practical and feasible manner. In addition, organisations can be certified for chain of custody under PEFC Denmark, according to PEFC International standard PEFC ST 2002:2010.

In this chapter the main results from the conformity assessment are presented for the most important requirements as indicated by the PEFC. The comparison with all minimum requirements (MRC) is presented in Annex 1.

All sections in this following chapter with quotation marks are cited PEFC DK documents or cited PEFC DK comments. All sections without quotation marks are comments made by Form.

4.1 Standard Setting Procedures

4.1.1 Analysis

PEFC Denmark carried out the standard setting process for its second revision from 2010 to 2012. The standard setting procedures are described in PEFC DK 008-2, which have been revised to meet the current PEFC requirements.

Through a comprehensive analysis of the standard setting procedures and processes Form was able to determine that the standard setting processes have been implemented according to PEFC DK's own procedures and also according to PEFC minimum requirements. Processes were documented in the Development Report, minutes of working group meetings and board meetings, web announcements, e-mails and other supporting documents.

No non-conformities were found.

4.1.2 Results

Req. 4.1: Is the standardising body required to have written procedures for standard setting activities?

Procedures

PEFC DK 008-2, section 4: "PEFC Denmark is responsible for the development and revision of the Danish PEFC certification scheme. The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority... The board shall establish one or more working groups for the development or revision of the standards."

PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The board of PEFC Denmark compiles the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work. The board of PEFC Denmark appoints a chairman for each group. The chairman can be selected from outside the group of nominated candidates. The role of the chairman is to ensure the management of the process and ensure that the decision procedures described in section 6, are followed."

PEFC DK 008-2, section 6: "The work in the working group shall be based on an open dialog and understanding and shall be organised in a way that:

- All working drafts and final documents relevant for the task of revision shall be available for all members of the working group,
 - 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
 - comments and views submitted by any member of the working group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded
- The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus."

Conforms

Req. 4.1a: Do the procedures describe 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

PEFC DK 008-2, section 4: "PEFC Denmark is responsible for the development and revision of the Danish PEFC certification scheme. The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority... The board shall establish one or more working groups for the development or revision of the standards."

PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The board of PEFC Denmark compiles the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work. The board of PEFC Denmark appoints a chairman for each group. The chairman can be selected from outside the group of nominated candidates. The role of the chairman is to ensure the management of the process and ensure that the decision procedures described in section 6, are followed."

PEFC DK 008-2, section 6: "The work in the working group shall be based on an open dialog and understanding and shall be organised in a way that:

- All working drafts and final documents relevant for the task of revision shall be available for all members of the working group,
- 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
- comments and views submitted by any member of the working group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded

The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus."

Conforms

Req. 4.1b: Do the procedures describe the record-keeping procedures?

Procedures

PEFC DK 008-2, section 9: "The following shall be observed to ensure transparency in the process: • A report describing the revision process shall be made to document the fulfilment of the procedures, • All working drafts and final documents relevant for the task of revision shall be available for all members of the working group, • All working drafts and final documents endorsed by the board of PEFC Denmark shall be publicly available on the webpage of PEFC Denmark."

Conforms

Req. 4.1c: Do the procedures describe the procedures for balanced representation of stakeholders?

Procedures

PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The invited parties shall represent

the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level. The board of PEFC Denmark defines the groups of stakeholders before the establishment of the working groups, based on a stakeholder mapping identifying relevant stakeholders related to the subject of the revision. The mapping exercise shall identify disadvantaged and key stakeholders and their key interest and what means of communication will best reach them. The composition of the group will depend on the areas and tasks to be handled by the group. In the working groups a balanced representation of stakeholders from different interest categories shall be provided.

The working group shall contain stakeholders:

- with expertise relevant to the subject matter of the standard
- that are materially affected by changes in the standard,
- that can influence the implementation of the standard

The materially affected stakeholders shall represent a meaningful segment of the participants. Supplementary experts (scientist and other experts) can be invited in order to impart the necessary knowledge. The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”

Conforms

Req. 4.1d: Do the procedures describe the standard-setting process?

In PEFC DK 008-2 the standard setting process is described. All sections of the document together form a comprehensive description of the process steps.

Conforms

Req. 4.1e: Do the procedures describe the mechanism for reaching consensus?

Note: Where a vote is used as a part of decision-making procedures, the standard-setting procedures include decision-making thresholds that are considered to achieve the consensus and that are consistent with the consensus definition.

Procedures

PEFC DK 008-2, section 6: “Consensus needs not imply unanimity. According to PEFC Councils definition (Section 3.1 in PEFC ST 1001:2010) of consensus, consensus is characterized by

the absence of sustained opposition to substantial issues by any important part of the concerned interests and by a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments. In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues:

- a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition
- a telephone conference where there is a verbal yes/no vote,
- an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response.

No single interest can dominate the process, and no single organisation can veto. When there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through:

- a) Discussion and negotiation internally in the working group, attempting to find a compromise.
- b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern.
- c) The appeal mechanism described in section 10. ”

Conforms

Req. 4.1f: Do the procedures describe the revision of standards/normative documents?

Procedures

PEFC DK 008-2, section 4: “PEFC Denmark is responsible for the development and revision of the Danish PEFC certification scheme. The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority. The Danish PEFC certification scheme shall undergo revision at least every fifth year. The board decides when to start the development and revision of the scheme. The board shall establish one or more working groups for the development or revision of the standards. The process of the revision, that shall take place every 5 years, shall be initiated within 2 years before the previous 5-year term expires. This shall be done to ensure sufficient time for the revision and the international endorsement process. The initiation of the revision and development of new standards shall be publicly announced in a suitable manner (though homepage, news letters etc.)”

Conforms

Req. 4.2: Is the standardising body required to make its standard-setting procedures publicly available and shall it regularly review its standard-setting procedures including consideration of comments from stakeholders?

Procedures

PEFC DK 008-2, section 4: “All working drafts and final documents endorsed by the board of PEFC Denmark shall be publicly available on the webpage of PEFC Denmark.”

This includes the standard setting procedures PEFC DK 008-2 and PEFC Denmark’s Statutes.

PEFC DK 008-2, section 4: “The Danish PEFC certification scheme shall undergo revision at least every fifth year. The board decides when to start the development and revision of the scheme. The board shall establish one or more working groups for the development or revision of the standards.”

PEFC DK 008-2, section 5: “The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders.”

PEFC DK 008-2, section 7: “The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated.”

The cited requirements in sections 4, 5 and 7 of PEFC DK 008-2 also apply to PEFC DK 008-2 itself and the PEFC Denmark statutes, as these are part of the Danish PEFC scheme.

Conforms

Process

PEFC DK 008-2 and PEFC DK Statutes §5.6 describe standard-setting procedures and can be downloaded from www.pefc.dk in Danish and in English (website accessed 5 September 2012).

Conforms

Req.4. 3: Is the standardising body required to 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? Shall the records be kept for a minimum of five years and shall they be available to interested parties upon request?

Procedures

PEFC DK 008-2, section 9: “The following shall be observed to ensure transparency in the process:

- A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmark's homepage
- All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time.
- All documents shall be kept for a minimum of five years and shall be available to interested parties upon request.”

Conforms

Process

A development report was produced describing the current revision process. It provides partial evidence of compliance with the PEFC Denmark standard-setting procedures.

Minutes of the standard setting process have been reviewed and found compliant with procedures.

Conforms

Req. 4.4: Is the standardising body required to establish a permanent or temporary working group/committee responsible for standard-setting activities?

Procedures

PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work."

Conforms

Process

Development report, Appointment of working groups: "The Board appointed the working groups at their meeting the 4th November 2010 based on nomination form invited stakeholders. All stakeholders interested in participating in the revision were included in the working group. The appointment of the working group was announced at PEFC Denmark's web-page. All participants were announced by e-mail."

Conforms

Req. 4.4a: Shall the working group/committee be accessible to materially and directly affected stakeholders?

Procedures

PEFC DK 008-2, section 4: "The initiation of the revision and development of new standards shall be publicly announced in a suitable manner (through homepage, news letters etc.)."

PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. Stakeholders shall be given at least one month to nominate their representative to the working groups."

Conforms

Process

Development report: "PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page."

PEFC DK invited 35 organisations directly, including directly and materially affected stakeholders. The web announcement informed the general public about the start of the process and the list of invited organisations. No evidence was found that it was communicated to other stakeholders than the invited ones that they also had the possibility to join the working groups.

PEFC DK argued that this was not a requirement in PEFC Technical Document (TD) Annex 2, which was the valid requirement at the time PEFC Denmark started the process in 2010. PEFC ST 1001:2010 entered into force on 15 May 2011. In TD Annex 2, section 3.4.1 it is required: “The process of development of certification criteria shall be initiated by national forest owners’ organisations or national forestry sector organisations having the support of the major forest owners’ organisations in that country. All relevant interested parties will be invited to participate in this process”.

The consultant accepts this explanation provided by PEFC DK, in combination with the revisions to the standard setting procedures to better comply with this requirement in future.

Conforms

Req. 4.4b: Shall the working group/committee have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process?

Procedures

PEFC DK 008-2, section 5: “The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level... In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”

PEFC DK 008-2, section 6: “No single interest can dominate the process, and no single organisation can veto.”

Conforms

Process

Development report: The list of people and organisations in the working groups is provided in Appendix 1 of that report and shows balanced representation covering the relevant stakeholder categories and geographical scope.

In the working group minutes no indication was found that the decision making process was dominated by a single interest.

There has been a case in the development of the standard where domination of interests played a role: One working group member representing the Danish Forest and Landscape Engineers wished to introduce a requirement that certified forest owners shall employ or contract a

person trained in a recognised Danish forestry education institute. Other group members opposed this view after which the member decided directly to stop the dialogue and leave the group. This working group member or his organisation did not re-open the dialogue and did not make use of existing appeal mechanisms or opportunities for public consultation. The consultant has viewed and analysed minutes and e-mail exchange concerning the matter and has observed that the decision was taken in an open and transparent manner. The consultant therefore judges this event to be compliant with procedures.

Conforms

Req. 4.4c: Shall the working group/committee 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? Shall the materially affected stakeholders represent a meaningful segment of the participants?

Procedures

PEFC DK 008-2, section 5: "The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level... In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The working group shall contain stakeholders:

- with expertise relevant to the subject matter of the standard
- that are materially affected by changes in the standard,
- that can influence the implementation of the standard

The materially affected stakeholders shall represent a meaningful segment of the participants. Supplementary experts (scientist and other experts) can be invited in order to impart the necessary knowledge."

Conforms

Process

Development report: The list of people and organisations in the working groups is provided in Appendix 1 of that report and shows that at least 50% of the members represent materially affected stakeholders.

The PEFC DK Board decided in its 41st meeting on 4 November 2010 that the 11 stakeholder groups that applied for a position in the working group jointly represented the most important interest groups in Denmark and to a sufficient extent. Especially the chair of the working groups was selected based on impartiality, factual knowledge of the matter and process oriented qualities.

Conforms

Req. 4.5: Is the standardising body required to establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders?

Procedures

PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall:

- acknowledge receipt of the complaint to the complainant,
- gather and verify all necessary information to validate the complaint
- appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark.
- Based on the recommendation from the appeal committee decide on the appeal
- Formally announce the result and information about the complaint procedure to the complainant."

Conforms

Process

PEFC DK 008-1 has been publicly available on www.pefc.dk (accessed on 7-9-2012) and was thus accessible to stakeholders.

Conforms

Req. 4.5a: Is the standard-setting body required to, upon receipt of the complaint, acknowledge receipt of the complaint to the complainant?

Procedures

PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall:

- acknowledge receipt of the complaint to the complainant"

Conforms

Process

PEFC Denmark states there have been no complaints regarding the standardising activities of this revision. Also from the international stakeholder consultation nor the survey carried out by the consultant no indications of complaints were found.

Conforms

Req. 4.5b: Is the standard-setting body required to, upon receipt of the complaint, gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint?

Procedures

PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall:

...

- gather and verify all necessary information to validate the complaint
- appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark.
- Based on the recommendation from the appeal committee decide on the appeal"

Conforms

Process

PEFC Denmark states there have been no complaints regarding the standardising activities of this revision. Also from the international stakeholder consultation nor the survey carried out by the consultant no indications of complaints were found.

Conforms

Req. 4.5c: Is the standard-setting body required to, upon receipt of the complaint, formally communicate the decision on the complaint and of the complaint handling process to the complainant?

Procedures

PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall:

...

- Formally announce the result and information about the complaint procedure to the complainant."

Conforms

Process

PEFC Denmark states there have been no complaints regarding the standardising activities of

this revision. Also from the international stakeholder consultation nor the survey carried out by the consultant, no indications of complaints were found.

Conforms

Req. 4.6: Is the standard-setting body required to 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

PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page."

Conforms

Req. 5.1: Is the standard-setting body required to identify stakeholders relevant to the objectives and scope of the standard-setting work?

Note: A stakeholder mapping exercise that includes defining which interest sectors are relevant and why, and for each sector what are likely to be the key issues, who are the key stakeholders, and what means of communication will best reach them, is a recognised means of meeting the requirement.

Procedures

PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level... The board of PEFC Denmark defines the groups of stakeholders before the establishment of the working groups, based on a stakeholder mapping identifying relevant stakeholders related to the subject of the revision. The mapping exercise shall identify disadvantaged and key stakeholders and their key interest and what means of communication will best reach them. The composition of the group will depend on the areas and tasks to be handled by the group."

Conforms

Process

Development report: "PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page."

In the 40th PEFC DK board meeting of 7 September 2010 the list of organisations to invite for the working groups was decided. No evidence was found that stakeholder mapping or a similar procedure was applied for stakeholder identification.

However, PEFC Denmark started the standard setting process in 2010 and the PEFC requirements at that time did not require stakeholder mapping or a similar detailed stakeholder analysis. The consultant therefore confirms the process to be compliant with the PEFC requirements that were valid in 2010.

PEFC DK has argued in addition that the board discussed the list of stakeholders prepared by the secretariat, the key stakeholders were identified and some few other stakeholders that could have interest in the revision were added to the list of stakeholders.

This argumentation and the revision of the standard setting procedures PEFC DK 008-2 are sufficient proof that the available procedures have been observed and in future the right procedures are clear and can be followed.

Conforms

Req. 5.2: Is the standard-setting body required to identify disadvantaged and key stakeholders, to address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities?

Procedures

PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level. ... The board of PEFC Denmark defines the groups of stakeholders before the establishment of the working groups, based on a stakeholder mapping identifying relevant stakeholders related to the subject of the revision. The mapping exercise shall identify disadvantaged and key stakeholders and their key interest and what means of communication will best reach them. The composition of the group will depend on the areas and tasks to be handled by the group."

Conforms

Process

Development report: "PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page."

The consultant is not aware of any disadvantaged groups in the Danish society that need special procedures in order to be reached or enabled to participate, which makes the defined procedure sufficient.

35 key stakeholders have been identified and proactively approached by PEFC Denmark.

Conforms

Req. 5.3: Is the standard-setting body required to 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

PEFC DK 008-2, section 4: “The initiation of the revision and development of new standards shall be publicly announced in a suitable manner (through homepage, news letters etc.)”

PEFC DK 008-2, section 5: “Stakeholders shall be given at least one month to nominate their representative to the working groups”

PEFC DK 008-2, section 7: “In connection with the start of the process the possibility to participate in the process shall be announced through an open invitation together with the possibility to comment on the procedures for development and revision of the standard.”

Conforms

Process

Development report: “PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page.”

The direct invitations to stakeholders conform with the procedures and with a month response time. The web announcement did include a weblink to the standard setting procedures, which describes the process and public consultation options, but did not include an open invitation for participation in the working groups.

The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation in the working groups. This is sufficient corrective action to comply in future with the current requirements.

Conforms

Req. 5.3a: Shall the announcement and invitation include information about the objectives, scope and the steps of the standard-setting process and its timetable?

Procedures

PEFC DK 008-2, section 5:

“The invitation shall include:

- the objectives, scope and the steps of the standard-setting process,
- a timetable,
- information about opportunities to participate in the process,
- an invitation to key stakeholders to nominate their representative to the working groups,
- an invitation to comment on the scope and the standard-setting process, and

- reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”

Conforms

Process

The invitation letters and web announcement include objective and scope. The total time expected for the process is given. The steps are not described, but a weblink was provided to the standard setting procedure PEFC DK 008-1, which also covers the process steps.

Conforms

Req. 5.3b: Shall the announcement and invitation include information about opportunities for stakeholders to participate in the process?

Procedures

PEFC DK 008-2, section 5:

“The invitation shall include:

- the objectives, scope and the steps of the standard-setting process,
- a timetable,
- information about opportunities to participate in the process,
- an invitation to key stakeholders to nominate their representative to the working groups,
- an invitation to comment on the scope and the standard-setting process, and
- reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”

Conforms

Process

The announcement on the web mentions that selected stakeholders have been invited, but the announcement does not contain an invitation to stakeholders that are not on the list developed by PEFC DK.

The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation of any interested party in the working groups. This is sufficient corrective action to comply in future with the current requirements.

Conforms

Req. 5.3c: Shall the announcement and invitation include an invitation to stakeholders to nominate their representative(s) to the working group/committee. Shall the invitation to disadvantaged and key stakeholders be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable?

Procedures

PEFC DK 008-2, section 5:

“The invitation shall include:

- the objectives, scope and the steps of the standard-setting process,
- a timetable,
- information about opportunities to participate in the process,
- an invitation to key stakeholders to nominate their representative to the working groups,
- an invitation to comment on the scope and the standard-setting process, and
- reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”

Conforms

Process

The announcement on the web mentions that selected stakeholders have been invited, but the announcement does not contain an invitation to stakeholders that are not on the list developed by PEFC DK.

The inclusion of this open invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation of any interested party in the working groups. This is sufficient corrective action to comply in future with the current requirements.

Conforms

Req. 5.3d: Shall the announcement and invitation include an invitation to comment on the scope and the standard-setting process?

Procedures

PEFC DK 008-2, section 5:

“The invitation shall include:

- the objectives, scope and the steps of the standard-setting process,
- a timetable,
- information about opportunities to participate in the process,
- an invitation to key stakeholders to nominate their representative to the working groups,
- an invitation to comment on the scope and the standard-setting process, and
- reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”

Conforms

Process

The web announcement does not contain an invitation to comment on the scope and the standard setting process.

The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require an invitation to comment on the scope and the standard-setting process. This is sufficient corrective action to comply in future with the current requirements.

Conforms

Req. 5.3e: Shall the announcement and invitation include reference to publicly available standard-setting procedures?

Procedures

PEFC DK 008-2, section 5:

“The invitation shall include:

- the objectives, scope and the steps of the standard-setting process,
- a timetable,
- information about opportunities to participate in the process,
- an invitation to key stakeholders to nominate their representative to the working groups,
- an invitation to comment on the scope and the standard-setting process, and
- reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”

Conforms

Process

The web announcement contained a weblink to the standard setting procedures PEFC DK 008-1. Also a copy of PEFC DK 008-1 accompanied the invitation letters.

Conforms

Req. 5.4: Is the standard-setting body required to review the standard-setting process based on comments received from the public announcement and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting?

Procedures

PEFC DK 008-2, section 5: “In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The board of PEFC Denmark compiles the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”

PEFC DK 008-2, section 7:

“The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”

Conforms

Process

All 11 stakeholders interested in participating in the revision were included in the working group. This was evidenced in the minutes of the 41st PEFC DK Board meeting of 4 November 2011 and justified based on balanced representation.

The consultant understands that the PEFC DK Board accepted in its 40th meeting a revised version of the standard setting procedures PEFC DK 008-1, which had been revised to comply with PEFC ST 1001:2010. It is unclear who was responsible for the revision. There is no evidence that the procedure has been opened for public consultation and reviewed based on stakeholder comments.

PEFC DK clarified in its response to the first interim report:

“At the 40th board meeting the revision of the standard setting procedures PEFC DK 008-1, was not thoroughly revised. Only new reference to PEFC Council revised document was amended. Since it was not a requirement to give stakeholders possibility to comment, nor a requirement to review the procedures it has not been explicitly done.”

PEFC DK complied with PEFC procedures that were the applicable requirements at the time standard setting started in 2010. However, the procedures have been adjusted to comply with current PEFC requirements, which is sufficient to ensure compliance with PEFC procedures in future.

Conforms

Req. 5.5a: Shall the work of the working group/committee be organised in an open and transparent manner where working drafts shall be available to all members of the working group/committee?

Procedures

PEFC 008-2, section 9: “All working drafts and final documents relevant for the task of revision shall be available for all members of the working group”

Conforms

Process

Development report: Table 2 lists working documents that were made available to working group members.

This was confirmed by working group members in the stakeholder survey.

Conforms

Req. 5.5b: Shall the work of the working group/committee be organised in an open and transparent manner where all members of the working group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts?

Procedures

PEFC 008-2, section 6: “The work in the working group shall be based on an open dialog and understanding and shall be organised in a way that:

...

- 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”

Conforms

Process

Development report: Table 2 provides a list of meetings, communication and decisions that show that meaningful opportunities have been provided. This was confirmed by minutes and responses from working group members that participated in the stakeholder survey.

Conforms

Req. 5.5c: Shall the work of the working group/committee be organised in an open and transparent manner where 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

PEFC 008-2, section 6: “The work in the working group shall be based on an open dialog and understanding and shall be organised in a way that:

...

- comments and views submitted by any member of the working group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded”

Conforms

Process

Development report: Table 2 provides an overview of the minutes that have been kept of the working group meetings.

Several minutes have been reviewed and contained detailed accounts of discussions, resolution of varying views and decision making.

Conforms

Req. 5.6a: Is the standard-setting body required to organise a public consultation on the enquiry draft and ensure that the start and the end of the public consultation is announced in a timely manner in suitable media?

Procedures

PEFC DK 008-2, section 7:

“Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days. Information about the consultation shall be sent directly to all stakeholders identified as relevant at the start of the process. Identified disadvantaged and key stakeholders shall be reached through the way of communication identified at the stakeholder mapping. The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated. A summary of the received observations and the consecutive

processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."

Conforms

Process

Development report, public consultation: "The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September. Mail was sent to all relevant stakeholders. An open seminar took place at the 21st of September, where the revised documents were presented and where it was possible to raise questions to the working groups."

The consultant confirmed this information in the web announcement, press release of the open seminar and invitation letters sent out to the stakeholders.

Conforms

Req. 5.6b: Is the standard-setting body required to organise a public consultation on the enquiry draft and ensure that the invitation of disadvantaged and key stakeholders be made by means that ensure that the information reaches its recipient and is understandable?

Procedures

PEFC DK 008-2, section 7:

"Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days. Information about the consultation shall be sent directly to all stakeholders identified as relevant at the start of the process. Identified disadvantaged and key stakeholders shall be reached through the way of communication identified at the stakeholder mapping. The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated. A summary of the received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."

Conforms

Process

Development report, public consultation: "The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September. Mail was sent to all relevant stakeholders. An open seminar took place at the 21st of September, where the revised documents were presented and where it was possible to raise questions to the working groups."

The consultant confirmed this information in the web announcement, invitation mails and press release of the open seminar. In Denmark no disadvantaged stakeholders are defined.

Conforms

Req. 5.6c: Is the standard-setting body required to organise a public consultation on the enquiry draft and ensure that the enquiry draft is publicly available and accessible?

Procedures

PEFC DK 008-2, section 9: “The following shall be observed to ensure transparency in the process:

- All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time.”

Conforms

Process

Development report, public consultation: “The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September.”

The web announcement was viewed on PEFC DK website.

Conforms

Req. 5.6d: Is the standard-setting body required to organise a public consultation on the enquiry draft and ensure that the public consultation is for at least 60 days?

Procedures

PEFC DK 008-2, section 7: “Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days.”

Conforms

Process

Development report, public consultation: “The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September.”

The web announcement was viewed on PEFC DK website.

Conforms

Req. 5.6e: Is the standard-setting body required to organise a public consultation on the enquiry draft and ensure that all comments received are considered by the working group/committee in an objective manner?

Procedures

PEFC DK 008-2, section 7: “The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated.”

Conforms

Process

Development report: "With the comments received during the public hearing the board decided the 23rd of November 2011 to submit the documents to a second processing in the working groups. All comments received during the consultation was published at the web-page before the comments was discussed in the working groups."

Comments from 15 stakeholders were received and objectively considered in a new working group process, evidenced in web publications, the board decision taken on 23 November 2011 and documentation of revisions to the standard in working documents:

"PEFC DK 001-X SkovstandardUDKAST4" and "udestående".

On request, PEFC DK provided the following comment: "The comments where gathered in a document (Hørringsamlet). First it was discussed at Board-level, where it was decided to send the documents to the working groups to discuss and handle the comments received. Most of the comments was for the forest management standard and the received comments was discussed and agreed at the working group at the 8th meeting. For the more technical documents we had a meeting with Danak, where after working group 2 was informed and through mail correspondence they agreed about the changes. For all the comments received there was created answers to the comments, which was gathered in (HøringssvarsamletPEFC bemærk2) and was published at the webpage when we announced the application for the re-endorsement as a news on the web page (<http://www.pefc.dk/site/115/390/>).

Everybody that commented on our scheme got at mail back thanking them for their contribution and they where told about the process forward."

Conforms

Req. 5.6f: Is the standard-setting body required to organise a public consultation on the enquiry draft and ensure that a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website?

Procedures

PEFC DK 008-2, section 7: "A summary of the received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."

Conforms

Process

PEFC DK comment: "For all the comments received there was created answers to the comments, which was gathered in (HøringssvarsamletPEFC bemærk2) and was published at the webpage when we announced the application for the re-endorsement as a news on the web page (<http://www.pefc.dk/site/115/390/>)."

Conforms

Req. 5.7: Is the standard-setting body required to organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee?

Procedures

PEFC DK 008-2, section 8: "For revised standards new elements shall be tested in the field, if the working group believes that previous experience from certification can not substitute for this. Results from pilot testing and field test shall be published at PEFC Denmark's web page. Experiences gained at pilot testing and field test shall be incorporated in to the final standard."

Conforms

Process

PEFC DK states no pilot testing was deemed necessary due to the limited nature of changes in the standards.

PEFC DK comment: "The Danish scheme has worked for 10 years and the changes in the forestry standard is not changed in a way that will require new pilot test. It was discussed in the working group and in the board and nobody found a need for pilot testing."

Conforms

Req. 5.8: Shall the decision of the working group to recommend the final draft for formal approval be taken on the basis of a consensus?

Procedures

PEFC DK 008-2, section 6: "The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus."

Conforms

Process

Development report: "The final draft, approved in the working groups, was approved by the board at the 28th of March 2012."

PEFC DK commented: "The last changes were agreed at the 8th meeting and the agreed changes can be seen in PEFC DK 001-X SkovstandardUDKAST4. Few issues was still not agreed and suggestion for new text was prepared by the representatives from the Nature protection organization and Danish Forest owners association and was then presented and agreed upon by the full group through mail correspondence."

The consultant has reviewed the mail correspondence and found no opposing views to the latest modifications. Also in the stakeholder survey no sustained opposition was encountered.

Conforms

Req. 5.8: Were the following alternative processes utilized In order to reach a consensus the working group/committee 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.?

b: a telephone conference meeting where there is a verbal yes/no vote?

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)?

d: combinations thereof?

Procedures

PEFC DK 008-2, section 6: "In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues:

- a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition
- a telephone conference where there is a verbal yes/no vote,
- an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response."

Conforms

Process

Development report, the Work at the working groups: "Meetings were placed at different meeting places in different parts of the country in order to spread the travel cost among members. All members where encouraged to sent written comments to the documents if they where not able to participate in the meetings. Working group 1 carried out the revision of the Forest Management Standard and the Terms and definitions. This group had 8 joint meetings. A part of the final corrections and clarifications was executed through mail. Working group 2 carried out the revision of the remaining normative and technical documents. This group held 2 joint meetings during the revision. The main part of the subsequent communication was executed through mail, due to an agreement by the participants."

This process was confirmed in working group minutes.

Samples of e-mail discussions from working group 1 and 2 were reviewed in which members indicated their agreement.

Conforms

Req. 5.9a: In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, shall the issue be resolved using the following mechanism(s)?

a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise

Procedures

PEFC DK 008-2, section 6: "When there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through:

- a) Discussion and negotiation internally in the working group, attempting to find a compromise.
- b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern.
- c) The appeal mechanism described in section 10."

Conforms

Process

A few critical issues were negotiated, for example on clear felling. Evidence is provided about the discussions and reaching consensus on this issue.

There is one reported case of sustained opposition. One working group member representing the Danish Forest and landscape Engineers wished to introduce a requirement that certified forest owners shall employ or contract a person trained in a recognised Danish forestry education institute. Other group members opposed this view after which the member decided directly to stop the dialogue and leave the group. This stakeholder group did not re-open the dialogue and did not make use of existing appeal mechanisms or opportunities for public consultation.

In this case the complaint and dispute mechanism was not made use of, but working group minutes and e-mail exchange make clear that this option was not pursued by the working group member himself. PEFC DK has been compliant with its procedures.

Conforms

Req. 5.9b: In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, shall the issue be resolved using the following mechanism(s)?

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

PEFC DK 008-2, section 6: "When there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through:

- a) Discussion and negotiation internally in the working group, attempting to find a compromise.
- b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern.
- c) The appeal mechanism described in section 10."

Conforms

Process

A few critical issues were negotiated in the working group meetings, for example on clear felling. Evidence is provided about the discussion and reaching consensus on the debated issues, in the minutes and samples of e-mails.

Conforms

Req. 5.9c: In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, shall the issue be resolved using the following mechanism(s)?

c) dispute resolution process

Procedures

PEFC DK 008-2, section 6: "When there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through:

- a) Discussion and negotiation internally in the working group, attempting to find a compromise.
- b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern.
- c) The appeal mechanism described in section 10."

PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall:

- acknowledge receipt of the complaint to the complainant,
- gather and verify all necessary information to validate the complaint
- appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark.
- Based on the recommendation from the appeal committee decide on the appeal
- Formally announce the result and information about the complaint procedure to the complainant."

Conforms

Process

The appeal mechanism has not been used, because there were no disputes or complaints submitted.

Conforms

Req. 5.10: Shall documentation on the implementation of the standard-setting process be made publicly available?

Procedures

PEFC DK 008-2, section 9: "The following shall be observed to ensure transparency in the process:

- A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmark's homepage

- All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time.
- All documents shall be kept for a minimum of five years and shall be available to interested parties upon request.”

Conforms

Process

The development report and several working documents were published on the PEFC DK website together with the revised scheme documentation.

Conforms

Req. 5.11: Shall the standardising body formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee?

Procedures

PEFC DK 008-2, section 4: “The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority.”

PEFC DK 008-2, section 6: “The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus.”

Conforms

Process

Development report, the board of PEFC Denmark: “The board held the main responsibility for the execution of the revision. The board commented on the drafts of the revised documents made by the working groups, before the documents were released for the public hearing. The board also has the responsibility of the final approval of the documents before they are passed on to PEFC International’s process of endorsement.”

Development report, final approval of the revised scheme: “The final draft, approved in the working groups, was approved by the board at the 28th of March 2012.”

This is evidenced in the Board meeting’s minutes. The minutes include reference that the Board determined that all standard setting procedures had been followed, which includes consensus as the basis for approval.

Conforms

Req. 5.12: Shall the formally approved standards/normative documents be published in a timely manner and made publicly available?

Procedures

PEFC DK 008-2, section 9: “The following shall be observed to ensure transparency in the process:

- A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmark's homepage
- All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time.
- All documents shall be kept for a minimum of five years and shall be available to interested parties upon request.”

Conforms

Process

PEFC DK communicated that the revised scheme documentation was published on the PEFC DK website on 2 May 2012.

Documents were found on the PEFC DK website.

Conforms

Req. 6.1: Shall the standards/normative documents be reviewed and revised at intervals that do not exceed a five-year period? Shall the procedures for the revision of the standards/normative documents follow those set out in chapter 5?

Process

Development report: PEFC Denmark has carried out its second scheme revision. The first revision was revised and endorsed in March 2008, with expiry date in March 2013. The second revision process started in September 2010 and lasted until March 2012. This is within the 5 year revision period.

The procedures in PEFC DK 008-1 for revision did not follow those in chapter 5 in all cases, but procedures were compliant with the PEFC requirements that were valid at the start of the revision process. In the revised version PEFC DK 008-2 the requirements in chapter 5 are met.

Conforms

Req. 6.2: Shall the revision define the application date and transition date of the revised standards/normative documents?

Process

Danish Scheme doc, section 11: “Unless specified otherwise in the standards under the Danish scheme, the transition period for implementation of changes to standards under the Danish scheme are one year from the time the standard has been approved by PEFC Council. New certificates issued after the [insert date of endorsement by PEFC Council] shall be issued according to the revised standards.”

This conforms provided that the application date will be inserted right after PEFC endorsement.

Conforms

Req. 6.3: Shall the application date not exceed a period of one year from the publication of the standard? This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training.

Process

Danish Scheme doc, section 11: “Unless specified otherwise in the standards under the Danish scheme, the transition period for implementation of changes to standards under the Danish scheme are one year from the time the standard has been approved by PEFC Council. New certificates issued after the [insert date of endorsement by PEFC Council] shall be issued according to the revised standards.”

Conforms

Req. 6.4: Shall the transition date not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period?

Process

Based on Danish Scheme doc, section 11, a one year transition period is applied.

Conforms

4.2 Group Certification Procedures

4.2.1 Analysis

Group certification requirements have been laid down in PEFC DK 003-4. This document is well in line with PEFC requirements. One non-conformity was identified.

4.2.2 Results

Req. 4.1a: 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

PEFC DK 007-2, section 2: “Group certification of forest management: Certification of forest management of a group of small and medium sized forest owners under one certificate.”

PEFC DK 003-4, section 5.5: “The group leader shall describe the structure of the organisation in relation to the activity as a group administrator, for example in an organisation chart. Procedures, roles, rights and duties for the work as a group leader shall be defined and distributed by the group leader. The management shall provide the necessary resources in order to carry out the work.”

The requirement demands a clear definition for group organization and this is not present in the standard. Also, there is no figure showing the relations between group leader, participants

and organization, like in the PEFC International standard, so this cannot serve as a substitute. For clarity purposes the group organisation shall be defined.

Does not conform

Req. 4.1b: 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?

b) the group entity

PEFC DK 007-2, section 2: "Group leader: is an organisation that organises and administers certification of groups of forest properties under the Danish PEFC scheme. The group leader represents all the group members in the group in relation to the certifying body and is responsible for ensuring compliance with the requirements from PEFC-Denmark."

PEFC DK 007-2, section 2: "Group members: Forest properties, which have signed a written agreement with a group leader about participation in a group certificate and are prepared to implement the requirements in the Danish PEFC scheme."

Conforms

Req. 4.1c: 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?

c) the participant

PEFC DK 007-2, section 2: "**Group members:** Forest properties, which have signed a written agreement with a group leader about participation in a group certificate and are prepared to implement the requirements in the Danish PEFC scheme."

Conforms

Req. 4.1d: 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?

d) the certified area

PEFC DK 007-2, section 2: "**Certified forest:** A forest area to which an independent certification body has granted certification or an area included in a group certificate."

PEFC DK 001-3, section 2: "The criteria in the standard apply for the following types of areas:

- Forest areas designated as forest reserve land
- Other forested areas
- Open nature areas, which constitute an integrated part of the forest or forest property

The criteria in the standard CANNOT be applied for the following types of areas:

- Agricultural land in rotation
- Gardens, parks and yards belonging to the property

As a basis, all the certifiable area of a property shall be included in the certification.

The owner can choose to excise parts of the property from the certificate. Coherent forest areas under one property cannot be excised.”

Conforms

Req. 4.1e: 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?

e) the group forest certificate

PEFC DK 007-2, section 2: “**Group certification of forest management:** Certification of forest management of a group of small and medium sized forest owners under one certificate.”

“**Certificate:** A document issued under the rules of a certification system, providing confidence that a duly identified product, process, or service, is in conformity with a specified standard or other normative document.”

Conforms

Req. 4.1f: 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?

f) the document confirming participation in group forest certification

PEFC DK 007-2, section 2: “All group members in a group shall have a legal or contractual connection to the group leader and be the subject to supervision from the group leader to secure the compliance with PEFC-Denmark’s Forest Management Standard.”

“**Forest management proof:** The group leader issues a forest management proof to all group members participation in a group certification. A forest management proof is not the same as a certificate.”

PEFC DK 003-4, section 5.4:

“For each group member a written agreement for participation in the group certification shall exist between the forest owner (or an authorized representative of the owner) and the group leader, which ensures an organisational or contractual connection that commits the forest owner to meet the requirement in PEFC Denmark’s Forest Management Standard.”

Conforms

Req. 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, shall the scheme 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?

PEFC DK 003-4, section 6:

“(8) If there is participation in several PEFC groups or upholding of an individual PEFC certificate, all the deviations identified during internal or external audits shall be announced to the remaining group leaders/ certification bodies with whom the forest is certified with.”

Conforms

Req. 4.1.3: Shall the forest certification scheme 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?

PEFC DK 003-4, section 5.3: "Group leaders administer and organise group certification of forest properties. In doing so the group leader shall carry out the following functions:

- Through a contractual connection and control ensure that the managements of the group members' forests comply with the requirements in PEFC Denmark's Forest Management Standard.
- Develop and operate an internal audit programme for internal annual audits of the group members and of the central administrative functions of the group leader, prior to the certification body starts its assessment.
- Based on the results of the internal and external audits, undertake corrective and preventive measures in case of identified deviations in the associated forests or the administrative system of the group leader. Subsequently the efficiency of the corrective and preventive measures is evaluated."

Conforms

Req. 4.1.4: Shall the forest certification scheme 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?

PEFC DK 003-4, section 5.7: "The group leader shall conduct internal audits of the management system at least annually. These shall cover all requirements in this guideline and conduct corrective and preventive actions if necessary."

"The group leader shall carry out internal audits of the group members at least once a year, so that it can be rendered probable that the individual group members comply with the requirements in PEFC Denmark's Forest Management Standard.

The internal audit shall be based on a sample among the group members. The group leader shall define a strategy of sampling, so that at least a number of group members equal to the square root of the number of all group members in the group, take part in the yearly audit.

When planning the internal audits and the selection of group members in that regard, the following shall be taken into consideration:

- The result from previous internal audits
- Received comments
- The variation of size of the properties
- Geographical distribution
- The association of the forest to the group in other regards"

PEFC DK 003-4, section 5.3:

"Based on the results of the internal and external audits, undertake corrective and preventive measures in case of identified deviations in the associated forests or the administrative system of the group leader. Subsequently the efficiency of the corrective and preventive measures is evaluated."

Conforms

Req. 4.2.1a: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body

PEFC DK 003-4, section 5.3:

“Group leaders administer and organise group certification of forest properties.”

PEFC DK 003-4, section 4:

“The group leader represents all the group members in the group in relation to the certifying body”

“the group leader shall carry out the following functions: [...]

To immediately inform the certification body and PEFC Denmark about issued, terminated, suspended and withdrawn forest management proofs in written.”

Conforms

Req. 4.2.1b: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

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

PEFC DK 003-4, section 4:

“**Group leader:** is an organisation that organises and administers certification of groups of forest properties under the Danish PEFC scheme. The group leader represents all the group members in the group in relation to the certifying body and is responsible for ensuring compliance with the requirements from PEFC- Denmark.”

PEFC DK 003-4, section 5.3:

“the group leader shall carry out the following functions: [...] Through a contractual connection and control ensure that the managements of the group members’ forests comply with the requirements in PEFC Denmark’s Forest Management Standard.”

Conforms

Req. 4.2.1c: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

c) To establish written procedures for the management of the group organisation

PEFC DK 003-4, section 5.2:

“It shall be demonstrated that the company has established a management system in accordance with this standard (section 5.3 – 5.10).”

With the company the group leader is meant.

PEFC DK 003-4, section 5.6:

“The group leader shall implement and maintain procedures for managing all documents and registrations required by the present document. [...].

As a minimum the following routines shall be described:

- The entering of the agreement regarding participation in the group certification.
- Issuance of forest managements proofs.
- Guidelines for collection of the documentation required in PEFC Denmark’s Forest Management Standard section 7.4 from the group members.
- Procedures in connection with conveyance of property or parts of property.
- Termination of agreement for participation in the group.
- Collection of remarks and observations received from external parties.
- Planning and implementation of internal audits.
- Handling of deviations and corrective actions. (annex 1)
- Document handling and filing procedures, including a register with issued forest management proofs containing information as required in section 5.3, continuous reporting of certification agreement to PEFC Denmark and filing of important documents or documents that may be important in relation to the completion of the certification. (An example is provided in annex 2).
- Other routines of interest for the administration of the group certification.”

Conforms

Req. 4.2.1d: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

d) To keep records of:

- *the group entity and participants’ conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme,*
- *all participants, including their contact details, identification of their forest property and its/their size(s),*
- *the certified area,*
- *the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken*

PEFC DK 003-4, section 5.3:

“the group leader shall carry out the following functions:[...]

- Issuing of forest management proofs with reference to a valid group certificate issued to the group leader.
- Through a contractual connection and control ensure that the managements of the group members’ forests comply with the requirements in PEFC Denmark’s Forest Management Standard.
- To handle a register of the certified forest properties containing the following information regarding each group member:

- Name of the forest property
- Name and address of the forest owner
- Name of contact person
- Phone number (contact person)
- Mail address (contact person)
- The date of the agreement coming into force
- The date of expiry of the agreement
- Number of the forest management proof
- The size of the certified area”

PEFC DK 003-4, section 5.6: “As a minimum the following routines shall be described:

- The entering of the agreement regarding participation in the group certification.
- Issuance of forest managements proofs.
- Guidelines for collection of the documentation required in PEFC Denmark’s Forest Management Standard section 7.4 from the group members.
- Procedures in connection with conveyance of property or parts of property.
- Termination of agreement for participation in the group.
- Collection of remarks and observations received from external parties.
- Planning and implementation of internal audits.
- Handling of deviations and corrective actions. (annex 1)
- Document handling and filing procedures, including a register with issued forest management proofs containing information as required in section 5.3, continuous reporting of certification agreement to PEFC Denmark and filing of important documents or documents that may be important in relation to the completion of the certification. (An example is provided in annex 2).
- Other routines of interest for the administration of the group certification.”

PEFC DK 003-4, section 5.7:

“The management of the group leader shall at least annually go through the reports from the internal audits.”

Conforms

Req. 4.2.1e: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

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

PEFC DK 003-4, section 5.4: “For each group member a written agreement for participation in the group certification shall exist between the forest owner (or an authorized representative of the owner) and the group leader, which ensures an organisational or contractual connection that commits the forest owner to meet the requirement in PEFC Denmark’s Forest Management Standard.”

“3. It is the duty of the group member to comply with Danish legislation concerning forestry, PEFC Denmark’s Forest Management Standard and other directions put forward by the group leader in order to maintain membership of the group.”

“5. The agreement shall include the right of the group leader to exclude any group member from participation in the group in case of repeated major deviations from PEFC Denmark’s Forest Management Standard.”

PEFC DK 003-4, section 6:

“By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum:

- 1) PEFC Denmark’s Forest Management Standard.
- 2) Relevant legislation and regulation associated with forestry in Denmark.
- 3) Control in the form of internal audits performed by the group leader and third party audits performed by a certification body.
- 4) Responding effectively to all requests from the group leader or certification body for relevant data, documentation or other information whether in connection with formal audits, reviews or otherwise.
- 5) Providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, relevant routine enquiries or corrective actions.
- 6) Implementation of relevant corrective and preventive actions established by the group leader.”

Conforms

Req. 4.2.1f: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

f) To provide participants with a document confirming participation in the group forest certification

PEFC DK 003-4, section 5.4:

“For each group member a written agreement for participation in the group certification shall exist between the forest owner (or an authorized representative of the owner) and the group leader”

“9. The agreement is made in 2 copies, one for the group member and one for the group leader.”

Conforms

Req. 4.2.1g: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

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

PEFC DK 003-4, section 5.3:

“the group leader shall carry out the following functions: [...]

- Provide all applicants with information and guidance needed for effective fulfilment of the requirements in PEFC Denmark’s Forest Management Standard.
- Continuously inform group members of changes in PEFC Denmark’s Forest Management Standard.”

Conforms

Req. 4.2.1h: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements

PEFC DK 003-4, section 5.3:

“the group leader shall carry out the following functions: [...]

- Develop and operate an internal audit programme for internal annual audits of the group members and of the central administrative functions of the group leader, prior to the certification body starts its assessment.”

Conforms

Req. 4.2.1i: Shall the forest certification scheme define the following requirements for the function and responsibility of the group entity?

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

PEFC DK 003-4, section 5.3:

“the group leader shall carry out the following functions: [...]

- Based on the results of the internal and external audits, undertake corrective and preventive measures in case of identified deviations in the associated forests or the administrative system of the group leader. Subsequently the efficiency of the corrective and preventive measures is evaluated.”

PEFC DK 003-4, section 5.7:

“The management of the group leader shall at least annually go through the reports from the internal audits.”

Conforms

Req. 4.3.1a: Shall The forest certification scheme define the following requirements for the participants?

a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme

PEFC DK 003-4, section 6:

“By signing the agreement with the group leader, the group member is committed to accept and observe

the following, as a minimum:

- 1) PEFC Denmark's Forest Management Standard.
- 2) Relevant legislation and regulation associated with forestry in Denmark.”

Conforms

Req. 4.3.1b: Shall The forest certification scheme define the following requirements for the participants?

b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme

PEFC DK 003-4, section 6:

“By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum:

- 1) PEFC Denmark’s Forest Management Standard.
- 2) Relevant legislation and regulation associated with forestry in Denmark.”

Conforms

Req. 4.3.1c: Shall The forest certification scheme define the following requirements for the participants?

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

PEFC DK 003-4, section 6:

“By signing the agreement with the group leader, the group member is committed to accept and observe

the following, as a minimum:

- 3) Control in the form of internal audits performed by the group leader and third party audits performed by a certification body.
- 4) Responding effectively to all requests from the group leader or certification body for relevant data, documentation or other information whether in connection with formal audits, reviews or otherwise.
- 5) Providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, relevant routine enquiries or corrective actions.”

Conforms

Req. 4.3.1d: Shall The forest certification scheme define the following requirements for the participants?

d) To implement relevant corrective and preventive actions established by the group entity

PEFC DK 003-4, section 6:

“By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum:

- 6) Implementation of relevant corrective and preventive actions established by the group leader.”

Conforms

4.3 Assessment of the Forest Management Standard

4.3.1 Analysis

The SFM standard (PEFC DK 001-3) covers all criteria from PEFC 1003:2010. On the requirement level there are a few caveats, as some requirements are not fully covered. In total, 2 non-conformities were identified regarding the forest management standard.

4.3.2 Results

General requirements for SFM standards

Req. 4.1a: Shall the requirements for sustainable forest management defined by regional, national or sub-national forest management standards:

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?

PEFC DK 001-3, section 2:

“The standard can be used to certify any type or size of forest property in Denmark.”

“As a basis, all the certifiable area of a property shall be included in the certification. The owner can choose to excise parts of the property from the certificate. Coherent forest areas under one property cannot be excised.”

PEFC DK 001-3, section 7:

“This section defines the criteria for sustainable forest management in Denmark. The criteria have been

grouped in the following 4 subsections:

1. Silviculture
2. Environment and biodiversity
3. Social
4. Management planning

The structure of the criteria is:

X. – The general grouping of the criteria (section).

X.1 – The criteria for sustainable forest management defined by PEFC Denmark.

I X.1.1 – Indicators and/or verifiers relating to the above stated criterion.”

Conforms

Req. 4.1b: Shall the requirements for sustainable forest management defined by regional, national or sub-national forest management standards:

b) be clear, objective-based and auditable?

PEFC DK 001-3, section 6:

“Overall the criteria form the basis for long term sustainable management of PEFC certified forests [...] the criteria and the indicators associated with them, ensure that it is possible to document the sustainable forest management to a qualified forest auditor.”

PEFC DK 001-3, section 7:

“The criteria have been grouped in the following 4 subsections:

1. Silviculture
2. Environment and biodiversity
3. Social
4. Management planning

The structure of the criteria is:

X. – The general grouping of the criteria (section).

X.1 – The criteria for sustainable forest management defined by PEFC Denmark.

I X.1.1 – Indicators and/or verifiers relating to the above stated criterion.”

Conforms

*Req. 4.1c: Shall the requirements for sustainable forest management defined by regional, national or sub-national forest management standards:
c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements ?*

PEFC DK 001-3, section 7:

“3.3. The forest owner and his employees shall be ready to enter into a dialogue with users and the

local community aiming i.e. at ensuring a reasonable:

- Planning and exerting of recreation in the forest.”

“3.6. The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees have the necessary skills to carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work. The forest owner shall continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.”

“3.7. The use of pesticides, including rodenticides, shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.”

“3.8. The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. This is ensured through the employees’ and specialized machine operators’ awareness of and compliance with the parts of the policy and objectives relevant for the task. Further the employees and specialized machine operators must have access to the written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task.[...]

I 3.8.1. Owner, permanent forest staff and specialized machine operators demonstrate a general knowledge about the PEFC Forest Management Standard and the thereof deflected considerations regarding the forest management relevant for their individual positions.
I 3.8.2. Employees and specialized machine operators have knowledge about and access to the written documentation.”

“3.9. Other contractors and users of the forest, e.g. hunters, firewood collectors, organizers of recreational activities etc., shall have specific information about protections and designations if it is assessed that the different values are possibly to be affected by the activity.”

Conforms

*Req. 4.1d: Shall the requirements for sustainable forest management defined by regional, national or sub-national forest management standards:
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards?*

PEFC DK 001-3, section 7.4.2:

“A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period. The written documentation for the forest property shall be available for the certification body conducting the audit. The documentation can be either an IT based management system, an existing management plan, a green management plan or similar.”

PEFC DK 001-3, sections 7.4.2, to 7.4.8 provide further specifications of what certified organisations need to record specifically. These records will provide evidence of compliance.

Conforms

Specific requirements for SFM standards

Detailed information regarding the DFCS assessment against the SFM criteria and indicators of PEFC ST 1003:2010 can be found in Annex 1 of this document.

Specific requirements for SFM standards		
Criteria	Indicators	Compliance
Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to global carbon cycle	1.1	Yes
	1.2	Yes
	1.3	Yes
	1.4	Yes
	1.5	Yes
	1.6	No
	1.7	Yes
	1.8	Yes
	1.9	Yes

	1.10	Yes
	1.11.a	Yes
	1.11.b	Yes
	1.11.c	Yes
	1.11.d	Yes
	1.12	Yes
Criterion 2: Maintenance of forest ecosystem health and vitality	2.1	Yes
	2.2	Yes
	2.3	Yes
	2.4	Yes
	2.5	Yes
	2.6	Yes
	2.7	Yes
	2.8	Yes
	2.9	Yes
	2.10	Yes
	2.11	Yes
	2.12	Yes
Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)	3.1	Yes
	3.2	Yes
	3.3	Yes
	3.4	Yes
	3.5	Yes
	3.6	Yes
	3.7	Yes
	3.8	Yes
Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems	4.1	Yes
	4.2.a	Yes
	4.2.b	Yes
	4.2.c	Yes
	4.2.d	Yes
	4.3	Yes
	4.4	Yes
	4.5	Yes
	4.6	Yes
	4.7	Yes
	4.8	Yes
	4.9	Yes
	4.10	Yes
4.11	Yes	
4.12	Yes	
4.13	Yes	
Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and	5.1	Yes
	5.2	Yes

water)	5.3	Yes
	5.4	Yes
	5.5	Yes
Criterion 6: Maintenance of other socio-economic functions and conditions	6.1	Yes
	6.2	Yes
	6.3	Yes
	6.4	Yes
	6.5	Yes
	6.6	Yes
	6.7	Yes
	6.8	Yes
	6.9	Yes
	6.10	No
	6.11	Yes
Criterion 7: Compliance with legal requirements	6.12	Yes
	6.13	Yes
	6.14	Yes
	7.1	Yes
	7.2	Yes

Here a list of non-conformities mentioned in the table above is provided per SFM indicator from PEFC ST 1003:2010, in which the argumentation for non-conformity is presented.

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.

Requirements for individual forest properties are as follows:

PEFC DK 005-3, section 6.4.4: "The certification report must include:

- A summary of the hearing of stakeholders

- A summary of the report that includes:

- Main data
- Management objectives as required in section 7.4.1 of "PEFC Denmark's forest management standard – PEFC DK 001-3"(only individually certified forest properties)
- Any deviations

Confidential and personal information may be excluded from the summary. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these.

The summary of the certification report shall be made available to the public by the certification body"

For group certified entities the requirement has been added to the responsibility of the group leader and required to be accepted by forest owners:

PEFC DK 003-4, section 5.3: "Group leaders administer and organise group certification of forest properties. In doing so the group leader shall carry out the following functions:

- ...

- Upon request from stakeholders, provide a summary of the individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard. Confidential and personal information may be excluded. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these."

PEFC DK 003-4, section 6: "By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum:

7) Upon request from stakeholders, the group leader to provide a summary of the individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard."

Both the requirements for individual properties and group certified properties do not comply with the minimum requirement for a number of reasons:

- For individual properties the required summary regards the certification report, not the management plan. It is not acceptable that the auditor is the only responsible for publishing the public summary of the management plan, because it is the same auditor that has to verify the conformity of this requirement. This would cause a circular verification process as the auditor would have to check himself. This is not auditable.
- For both individual and group certified properties PEFC DK requires as a minimum that management objectives are included in the summary. This is not according to the requirement that the summary shall be appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied.

Does not conform

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.

PEFC DK 001-3, section 7.3.3: "The forest owner and his employees shall be ready to enter into a dialogue with users and the local community aiming i.e. at ensuring a reasonable:

- Planning and exerting of recreation in the forest.
- Utilization of knowledge about the natural and cultural history of the forest."

No requirement was found for mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.

PEFC DK states that: "Due to § 62 in the Forest Act anyone with a significant interest in a case is entitled to complain to the Natural and Environmental Appeal Board. The Natural and Environmental Appeal Board is an independent complaints authority for administrative decisions within the plan, nature and the environment areas.

§§ 60 – 64 in the Forest Act gives the more detailed rules for handling complaints.

While the same possibilities for complaints are given in the Nature Protection Act (§§ 78-87).

The possibility for complaining within the plan, nature and the environment areas is often used and decisions of the Board are used in the administration of laws.”

Although these legal possibilities for appeal may play a role in some cases, it is in the spirit of this requirement that complaints and disputes are solved as much as possible at the level where they occur, i.e. between manager and local people. Including a government authority is a possible next step.

A mechanism ‘above’ the forest management level is acceptable in case it can functionally serve the purpose of effective communication and consultation with local people and other stakeholders relating to sustainable forest management and for resolving complaints and disputes relating to forest management between forest operators and local people.

The mechanism cited by PEFC Denmark can only serve partly to cover the requirement, because the mechanism relates to appeals regarding administrative decisions taken by the government and issues under the jurisdiction of the government. Any other issues, including private to private complaints, are not covered under the scope of the cited mechanism. Also, there is a missing link in the chain of events before arriving at an appeal. Appeals are made against formal decisions, whereas a complaint or dispute does not need to be a reaction to a formal decision. The missing link is the complaint and dispute resolution mechanism relating to forest management between forest operators and local people.

Does not conform

4.4 Assessment of the Chain of Custody procedures

According to the scheme documentation, the generic Chain of Custody standard of PEFC has been adopted:

The Danish Scheme doc, Section 3. References: “Chain of custody certification within the framework of the Danish scheme is carried out in accordance with the requirements of the international standard for Chain of custody; PEFC ST 2002:2010: Chain of custody of forest based products.”

No further assessment had to be carried out. This adoption conforms to PEFC requirements.

4.5 Logo usage rules

According to the scheme documentation, the PEFC logo procedures have been adopted:

The Danish Scheme doc, Section 9. Use of the PEFC Logo: “All use of the PEFC logo, trademark or any associated claims made in connection with forest management certification under the Danish scheme will be carried out in accordance with “PEFC Logo Usage Rules – PEFC ST 2001:2008 v2”.

No further assessment had to be carried out. This adoption conforms to PEFC requirements.

4.6 Certification and accreditation procedures

4.6.1 Analysis

Certification and accreditation procedures for forest management certification are provided in PEFC DK 005-3. These procedures have been found to comply with the PEFC minimum requirements.

PEFC Denmark formally approved the international standard “Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2012)” at their meeting on the 23rd of October and it has been incorporated in to the Danish scheme.

PEFC DK 005-3, section 1: “For requirements for certification bodies operating PEFC chain of custody certification in Denmark according to the international chain of custody standard the international requirements “Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2012)” apply.”

For procedures for certification and accreditation of chain of custody certification no further assessment had to be carried out. This adoption conforms to PEFC requirements.

4.6.2 Results

Req. 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?

The Danish Scheme doc chapter 7.2: “PEFC is based on independent accreditation of certification organizations. Therefore it is an explicit requirement that all certification audits carried out under the Danish scheme must be carried out by third-party independent and PEFC notified certification bodies accredited by DANAK or other national European-based accreditation bodies which are members of the European Cooperation for Accreditation (EA) and/or the International Accreditation Forum (IAF) and have signed the agreement of mutual recognition.”

Conforms

Req. 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?

PEFC DK 005-3 chapter 5.1: "The auditors must:

1. Fulfil the general criteria, as appropriate, for environmental auditors defined in DS/EN ISO/IEC 17021:2011: Conformity assessment - Requirements for bodies providing audit and certification of management systems, (...)"

PEFC DK 005-3 chapter 6.3: "The qualification criteria for the certification bodies used in certification audits of sustainable forest management and group certification of sustainable forest management, are based on the "Requirements for bodies providing audit and certification of management systems" (DS/EN ISO/IEC 17021:2011), supplemented with specified requirements from PEFC Denmark and expertise within the sector. The certification body must:

1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard"

Conforms

Req. 3: Does the scheme documentation require that certification body chain of custody certification against Annex 4 shall fulfil requirements defined in ISO Guide 65?

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req. 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?

PEFC DK 005-3 chapter 6.3: "The certification body must:

...

4. Have technical competence in forest management on its economic, social and environmental impacts."

Conforms

Req. 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?

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req. 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?

PEFC DK 005-3 chapter 6.3: “The qualification criteria for the certification bodies used in certification audits of sustainable forest management and group certification of sustainable forest management, are based on the “Requirements for bodies providing audit and certification of management systems” (DS/EN ISO/IEC 17021:2011), supplemented with specified requirements from PEFC Denmark and expertise within the sector. The certification body must:

1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard, and
2. Use a documented method, according to which the forest management may be audited and certified (certification procedure), and
3. Have a good understanding of the Danish scheme, with regard to sustainable forest management.”

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req. 7: Does the scheme documentation require that certification bodies have the responsibility to use competent auditors who have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification?

PEFC DK 005-3 chapter 5.1: “At audits the certification body shall use a person with a professional expertise within forestry and forestry’s environmental impact. This person shall have two years of practical experience with Danish forest management. Beside of that, at least one person with experience of certification procedure shall participate as well. The same person can handle both tasks.”

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req. 8: Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?

All ISO 19011 requirements are incorporated in ISO17021. PEFC DK 005-3, section 5.1: “The auditors must: 1. Fulfil the general criteria, as appropriate, for environmental auditors defined in DS/EN ISO/IEC 17021:2011”

Conforms

*Req. 9: Does the scheme documentation include additional qualification requirements for auditors carrying out forest management or chain of custody audits? [*1]*

PEFC DK 005-3 chapter 5.1: "At audits the certification body shall use a person with a professional expertise within forestry and forestry's environmental impact. This person shall have two years of practical experience with Danish forest management. Beside of that, at least one person with experience of certification procedure shall participate as well. The same person can handle both tasks."

Conforms

Req. 10: Does the scheme documentation require that certification bodies shall have established internal procedures for forest management and/or chain of custody certification?

PEFC DK 005-3 chapter 6.5 : "The certification body shall establish internal procedures for sustainable forest management certification and auditing, including group certification of sustainable forest management, according to the Danish scheme."

Conforms

Req. 11: Does the scheme documentation require that applied certification procedures for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?

PEFC DK 005-3 chapter 6.5 : "The procedures shall fulfil the requirements in DS/EN ISO/IEC 17021:2011."

Conforms

Req. 12: Does the scheme documentation require that applied certification procedures for chain of custody certification against Annex 4 shall fulfil or be compatible with the requirements defined in ISO Guide 65?

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req.13: Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?

All ISO 19011 requirements are incorporated in ISO17021.

PEFC DK 005-3, section 6.5: "The certification body shall establish internal procedures for sustainable forest management certification and auditing, including group certification of sustainable forest management, according to the Danish scheme."

The procedures shall fulfil the requirements in DS/EN ISO/IEC 17021:2011.”

Conforms

Req. 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?

PEFC DK 005-3: “The certification body shall inform PEFC Denmark about all issued forest management and group certificates and changes concerning validity and scope of these certificates”

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req. 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?

ISO/IEC 17021:2011 section 9.3.2.1 h: “The surveillance audit programme shall include, at least: (...) h) use of marks and/or any other reference to certification.”

Conforms

Req. 16: Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?

PEFC DK 6.5.7: “The certification body shall carry out surveillance audits of certified forest properties and group leaders at least once a year during the validity of the certificates to verify continued compliance with the requirements in the Danish scheme.”

Conforms

Req. 17: Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?

PEFC DK 005-3: “The certification body must:

1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard.”

The maximum assessment period or validity period of forest management certificates is regulated through the ISO 17021 standard. As described in ISO 17021, section 9.1.1.2, the certification cycle may not exceed 3 years.

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req. 18: Does the scheme documentation include requirements for public availability of certification report summaries?

PEFC DK 005-3 chapter 6.5.4: “The summary of the certification report shall be made available to the public by the certification body.”

Conforms

Req. 19: Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?

PEFC DK 005-3 chapter 6.5.3: “**Public consultation.** Before the conformity assessment with “PEFC Denmark’s Forest Management Standard – PEFC DK 001-3”, relevant external stakeholders shall be consulted, with a time limit of at least 14 days. The public consultation shall at least be announced at the certification body’s homepage. Relevant information from external parties shall subsequently be included in the assessment as appropriate.”

Conforms

Req. 20: Does the scheme documentation include additional requirements for certification procedures?

PEFC DK 005-3 chapter 6.4 (6.4.1 – 6.4.4) contains the additional requirements for certification procedures: “PEFC Denmark’s supplementary requirements to DS/EN ISO/IEC 17021:2011 for certification bodies operating certification of sustainable forest management and group certification of sustainable forest management under the Danish system are specified as follows”.

Conforms

Req. 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?

PEFC DK 005-3 chapter 6.1: “The accreditation can be issued by the Danish Accreditation and Metrology Fund – DANAK, or by an equally acknowledged accreditation body, which has signed the multilateral agreement on mutual recognition developed by the European co-operation for Accreditation (EA) and is a member of IAF (International Accreditation Forum).”

Conforms

Req. 22: Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?

PEFC DK 005-3 chapter 6.6: “The certificates shall as a minimum contain information about: (...)- Accreditation symbol of the relevant accreditation body”

Conforms

Req. 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 and which implement procedures described in ISO 17011 and other documents recognised by the above-mentioned organisations?

PEFC DK 005-3 chapter 6.1: “The accreditation can be issued by the Danish Accreditation and Metrology Fund – DANAK, or by an equally acknowledged accreditation body, which has signed the multilateral agreement on mutual recognition developed by the European co-operation for Accreditation (EA) and is a member of IAF (International Accreditation Forum).”

Conforms

Req. 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?

PEFC DK 005-3 chapter 6.1: “Certification bodies carrying out forest management certification and/or group certification of sustainable forest management shall be accredited to do this.”

PEFC DK 005-3 chapter 6.3: “The qualification criteria for the certification bodies used in certification audits of sustainable forest management and group certification of sustainable forest management, are based on the “Requirements for bodies providing audit and certification of management systems” (DS/EN ISO/IEC 17021:2011), supplemented with specified requirements from PEFC Denmark and expertise within the sector. The certification body must:

1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard,”

Conforms

Req. 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?

For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.

Conforms

Req. 26: Does the scheme documentation include a mechanism for PEFC notification of certification bodies?

PEFC DK 005-3 chapter 6.2: “Certification bodies carrying out forest management certification and/or group certification of sustainable forest management under the Danish scheme shall be PEFC notified by PEFC Denmark according to “PEFC Denmark’s requirements for notification of certification bodies PEFC DK 006-2”.”

Conforms

Req. 27 Are the procedures for PEFC notification of certification bodies non-discriminatory?

PEFC DK 006-2: "The certification body applying for PEFC notification from the PEFC Council shall:

- Be a legal entity;
- Agree to be listed on the publicly available PEFC Council Internet database including the certification body's identification data and / or other data as specified in the *Internal Rules for the PEFC Registration system*;
- Have valid accreditation issued, by a national accreditation body which is a part of the European co-operation for Accreditation (EA) and/or the International Accreditation Forum (IAF) umbrella and have signed the agreement of mutual recognition. The accreditation shall be issued against ISO Guide 65 (General requirements for certification / registration bodies operating product certification) and supplementary requirements defined by PEFC Denmark in "*PEFC Denmark's Guidelines for auditors and certification bodies – PEFC DK 005-2*". The scope of the accreditation shall explicitly include "*PEFC Denmark's forestry standard – PEFC DK 001-2*" and/or "*PEFC Denmark's Guidelines for certification of umbrella organisations – PEFC DK 003-3*" and/or Annex 4 (*Chain of Custody of Forest Based Products – Requirements*);
- Sign a PEFC notification contract with the PEFC Denmark (*Appendix 1*)."

Conforms

4.7 Complaints and dispute resolution procedures

4.7.1 Analysis

Complaints and dispute resolution procedures for scheme administration as described in PEFC GD 1004:2009 are included in the Danish Scheme document, section 10 and in the PEFC Denmark Statutes.

One non-conformity was identified regarding complaints and dispute resolution procedures.

4.7.2 Results

Req. 1: Does the scheme require written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme?

Danish Scheme document, section 10: "Appeals, complaints and disputes relating to issuance and withdrawal of certificates shall be brought before and handled by the certification body's own procedures.

An appeal committee appointed by PEFC Denmark ("Statutes of PEFC Denmark", §7) shall deal with other complaints and disputes arising from implementation and interpretation of the

Danish scheme that cannot be addressed in the dispute settlement procedures of the relevant certification or accreditation body”

PEFC Denmark Statutes, §7: "§7 Appeal Committee

7.1 The Board of PEFC Denmark has the overall responsibility to handle and solve disputes and complaints related to certification under the Danish scheme, which cannot be solved by the certification bodies' or accreditations bodies' own procedures.

7.2 Two distinct types of situations, where an appeal committee are needed, can arise:

- Disputes relating to the implementation of the requirements in the Danish scheme in tangible cases.
- Complaints concerning the clarity and interpretation of the requirement in the Danish scheme.

An appeal committee shall be established if an agreement between the involved parties cannot be obtained.

7.3 An application for settlement of complaints and disputes shall be addressed in writing to the Board of PEFC Denmark together with relevant documentation. The Board assess whether the disputes and complaints fall within the two types defined in § 7.2.

7.4 An impartial appeal committee with the necessary expertise to evaluate the complaints and disputes shall be established if the conditions in § 7.3 are fulfilled. The appeal committee are established on ad hoc basis. The appeal committee shall consist of 3 members. Each part appoints 1 member. The two members agree on the third member, who at the same time shall act as chairman for the appeal committee. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the Board of PEFC Denmark.”

The cited quotations show that written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme are integrally part of the scheme documentation. Because of this no separate requirement is needed that requires written procedures, because they are already in place.

Conforms

Req. 2a: Does the complaint procedure provide for acknowledgement of the complaint to the complainant upon receipt of the complaint?

Danish scheme document, section 10: “Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:

- acknowledge receipt of the complaint/dispute to the complainant,
 - gather and verify all necessary information to validate the complaint/dispute
 - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7).
 - Based on the recommendation from the appeal committee decide on the appeal
- Formally announce the result and information about the complaint procedure to the complainant“

Conforms

Req. 2b: Does the complaint procedure provide for gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint upon receipt of the complaint?

Danish scheme document, section 10: "Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:

- acknowledge receipt of the complaint/dispute to the complainant,
- gather and verify all necessary information to validate the complaint/dispute
- appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7).

- Based on the recommendation from the appeal committee decide on the appeal

Formally announce the result and information about the complaint procedure to the complainant"

Conforms

Req. 2c: Does the complaint procedure provide for formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties upon receipt of the complaint?

Danish scheme document, section 10: "Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:

- acknowledge receipt of the complaint/dispute to the complainant,
- gather and verify all necessary information to validate the complaint/dispute
- appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7).

- Based on the recommendation from the appeal committee decide on the appeal

Formally announce the result and information about the complaint procedure to the complainant"

Conforms

Req. 2d: Does the complaint procedure provide for appropriate corrective and preventive actions?

PEFC DK Statutes, §7:

"§7 Appeal Committee

7.1 The Board of PEFC Denmark has the overall responsibility to handle and solve disputes and complaints related to certification under the Danish scheme, which cannot be solved by the certification bodies' or accreditations bodies' own procedures."

No reference is found that PEFC Denmark will use the experience and outcomes of complaint and dispute procedures to formulate appropriate corrective and preventive actions.

Does not conform

5. PUBLIC CONSULTATION

The international public consultation was open between 8 Jun 2012 to 7 Aug 2012 and two comments were received.

To review the standard setting process questionnaires were sent to working group members that took part in the revision process and to stakeholders that have been invited to take part, but did not participate in the working groups. Invitations were sent on 19 September 2012 and the deadline for submission was 26 October 2012. The questionnaire that was used can be found in annex 2.

Form sent out questionnaires to 35 stakeholders that were invited to participate in the standard setting, 11 of which participated in the working groups. In total, 9 responses have been received to the questionnaire (26% response). Responses came mainly from members of the two working groups (8), but also from other stakeholders (1).

The answers to the questions confirmed compliance of the standard setting process with PEFC's required procedures for the sample of procedures that has been included in the survey. There was one remark that the working groups had a large proportion of forestry representatives as compared with other groups, but all respondents agreed that there was a sufficiently balanced group composition, all participants had meaningful opportunities to contribute to the process and that decision making was based on consensus.

The results of this analysis have been used as supporting evidence to review the standard setting process.

The questionnaire that was used can be found in annex 2.

ANNEX 1: MINIMUM REQUIREMENT CHECKLIST

Guidelines PEFC Council Minimum Requirements Checklist	Revised on 26 th May 2011	GL 2/2011
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PEFC Council Minimum Requirements Checklist

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OBJECTIVE

The objectives of this guideline are (i) to assist bodies, which develop or revise their forest certification schemes and preparation of an application for PEFC Council endorsement, and (ii) to facilitate the assessment of the compliance of a national or sub-national forest certification scheme against the PEFC Council requirements carried out by the PEFC Council as a part of its endorsement and mutual recognition process (*Annex 7 Endorsement and Mutual Recognition of National Schemes and their Revision*).

SCOPE

These guidelines cover the PEFC Council minimum requirements, which shall be met by national and sub-national schemes and standards applying for PEFC Council endorsement and mutual recognition as per chapter 4, Annex 7 (*Endorsement and Mutual Recognition of National Schemes and their Revision*), and are a part of the application for the PEFC Council endorsement and mutual recognition as defined by chapter 5, Annex 7 (*Endorsement and Mutual Recognition of National Schemes and their Revision*).

These guidelines were adopted by the PEFC Council Board of Directors on 2 April 2003 and revised on 27 January 2005, 28 April 2005, 26 January 2006 26 January 2007, 31 January 2008 4 February 2010 and 26 May 2011.

LIST OF DOCUMENTS AND THEIR ABBREVIATIONS

Document	Abbreviation
PEFC Denmark Application	Application letter
Report on the Danish Certification System technical document revision process	Development report
The Danish PEFC Certification Scheme for sustainable forest Management revoct	Danish Scheme doc.
PEFC Denmark's Forestry standard revoct	PEFC DK 001-3
PEFC Denmark's Requirements for group certification of sustainable forest management revoct	PEFC DK 003-4
PEFC Denmark's Requirement for certification and accreditation procedures revoct	PEFC DK 005-3
PEFC Denmark's requirements for notification of certification bodies	PEFC DK 006-2
Terms and definitions	PEFC DK 007-2
Procedure for development and revision of the Danish PEFC certification scheme – rev 2 revoct	PEFC DK 008-2
PEFC Denmark's statutes	PEFC Denmark's statutes
The Danish Forest Act	DFA
Comments from public consultation with PEFC DK responses	HøringssvarsamletPEFC bemærk2
Revised draft standard after public consultation	PEFC DK 001-X SkovstandardUDKAST4
List of unresolved issues	Udeståender
Minutes working groups	Minutes working groups
Minutes board meeting	Minutes board meeting

PART I: MINIMUM REQUIREMENTS CHECKLIST FOR STANDARD SETTING (PEFC ST 1001:2010)

1 SCOPE

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

2 CHECKLIST

Question	Assess. basis*	YES /NO*	Reference to application documents
Standardising Body			
4.1 The standardising body shall have written procedures for standard-setting activities describing:			
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	Yes	<p>PEFC DK 008-2, section 4: “PEFC Denmark is responsible for the development and revision of the Danish PEFC certification scheme. The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority... The board shall establish one or more working groups for the development or revision of the standards.”</p> <p>PEFC DK 008-2, section 5: “All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The board of PEFC Denmark compiles the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work. The board of PEFC Denmark appoints a chairman for each group. The chairman can be selected from outside the group of nominated candidates. The role of the chairman is to ensure the management of the process and ensure that the decision procedures described in section 6, are followed.”</p> <p>PEFC DK 008-2, section 6: “The work in the working group shall be based on</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>an open dialog and understanding and shall be organised in a way that:</p> <ul style="list-style-type: none"> - All working drafts and final documents relevant for the task of revision shall be available for all members of the working group, - 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 - comments and views submitted by any member of the working group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded <p>The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus.”</p>
b) the record-keeping procedures,	Procedures	Yes		<p>PEFC DK 008-2, section 9: “The following shall be observed to ensure transparency in the process: • A report describing the revision process shall be made to document the fulfilment of the procedures, • All working drafts and final documents relevant for the task of revision shall be available for all members of the working group, • All working drafts and final documents endorsed by the board of PEFC Denmark shall be publicly available on the webpage of PEFC Denmark.”</p>
c) the procedures for balanced representation of stakeholders,	Procedures	Yes		<p>PEFC DK 008-2, section 5: “All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations,</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>retailers and other relevant organisations at national or sub-national level. The board of PEFC Denmark defines the groups of stakeholders before the establishment of the working groups, based on a stakeholder mapping identifying relevant stakeholders related to the subject of the revision. The mapping exercise shall identify disadvantaged and key stakeholders and their key interest and what means of communication will best reach them. The composition of the group will depend on the areas and tasks to be handled by the group. In the working groups a balanced representation of stakeholders from different interest categories shall be provided.</p> <p>The working group shall contain stakeholders:</p> <ul style="list-style-type: none"> - with expertise relevant to the subject matter of the standard - that are materially affected by changes in the standard, - that can influence the implementation of the standard <p>The materially affected stakeholders shall represent a meaningful segment of the participants. Supplementary experts (scientist and other experts) can be invited in order to impart the necessary knowledge. The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”</p>
d) the standard-setting process,	Procedures	Yes		In PEFC DK 008-2 the standard setting process is described. All sections of the document together form a comprehensive description of the

Question	Assess. basis*		YES /NO*	Reference to application documents
			process steps.	
e) the mechanism for reaching consensus, and	Procedures	Yes	<p>PEFC DK 008-2, section 6: “Consensus needs not imply unanimity. According to PEFC Councils definition (Section 3.1 in PEFC ST 1001:2010) of consensus, consensus is characterized by the absence of sustained opposition to substantial issues by any important part of the concerned interests and by a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments. In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues:</p> <ul style="list-style-type: none"> - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there is a verbal yes/no vote, - an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response. <p>No single interest can dominate the process, and no single organisation can veto. When there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through:</p> <ul style="list-style-type: none"> a) Discussion and negotiation internally in the working group, attempting to find a compromise. b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern. c) The appeal mechanism described in section 10. ” 	

Question	Assess. basis*		YES /NO*	Reference to application documents
f) revision of standards/normative documents.	Procedures	Yes		<p>PEFC DK 008-2, section 4: "PEFC Denmark is responsible for the development and revision of the Danish PEFC certification scheme. The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority. The Danish PEFC certification scheme shall undergo revision at least every fifth year. The board decides when to start the development and revision of the scheme. The board shall establish one or more working groups for the development or revision of the standards. The process of the revision, that shall take place every 5 years, shall be initiated within 2 years before the previous 5-year term expires. This shall be done to ensure sufficient time for the revision and the international endorsement process. The initiation of the revision and development of new standards shall be publicly announced in a suitable manner (though homepage, news letters etc.)."</p>
4.2 The standardising body shall make its standard-setting procedures publicly available and shall regularly review its standard-setting procedures including consideration of comments from stakeholders.	Procedures	Yes		<p>PEFC DK 008-2, section 4: "All working drafts and final documents endorsed by the board of PEFC Denmark shall be publicly available on the webpage of PEFC Denmark."</p> <p>This includes the standard setting procedures PEFC DK 008-2 and PEFC Denmark's Statutes.</p> <p>PEFC DK 008-2, section 4: "The Danish PEFC certification scheme shall undergo revision at least every fifth year. The board decides when to start the development and revision of the scheme. The board shall establish one or more working groups for the development or revision of the standards."</p> <p>PEFC DK 008-2, section 5: "The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders."</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>PEFC DK 008-2, section 7: "The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated."</p> <p>The cited requirements in sections 4, 5 and 7 of PEFC DK 008-2 also apply to PEFC DK 008-2 itself and the PEFC Denmark statutes, as these are part of the Danish PEFC scheme.</p>
	Process	Yes		<p>PEFC DK 008-2 and PEFC DK Statutes §5.6 describe standard-setting procedures and can be downloaded from www.pefc.dk in Danish and in English (website accessed 5 September 2012).</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>	Procedures	Yes		<p>PEFC DK 008-2, section 9: "The following shall be observed to ensure transparency in the process:• A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmark's homepage</p> <ul style="list-style-type: none"> • All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time. • All documents shall be kept for a minimum of five years and shall be available to interested parties upon request."
	Process	Yes		<p>A development report was produced describing the current revision process. It provides partial evidence of compliance with the PEFC Denmark standard-setting procedures.</p> <p>Minutes of the standard setting process have been reviewed and found compliant with procedures.</p>
<p>4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.</p>	Procedures	Yes		<p>PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				that interested parties have to be members of PEFC Denmark. The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work."
	Process	Yes		Development report, Appointment of working groups: "The Board appointed the working groups at their meeting the 4th November 2010 based on nomination form invited stakeholders. All stakeholders interested in participating in the revision were included in the working group. The appointment of the working group was announced at PEFC Denmark's web-page. All participants were announced by e-mail."
4.4 The working group/committee shall:				
a) be accessible to materially and directly affected stakeholders,	Procedures	Yes		PEFC DK 008-2, section 4: "The initiation of the revision and development of new standards shall be publicly announced in a suitable manner (through homepage, news letters etc.)." PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. Stakeholders shall be given at least one month to nominate their representative to the working groups."
	Process	Yes		Development report: "PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>time announced at the web-page.”</p> <p>PEFC DK invited 35 organisations directly, including directly and materially affected stakeholders.</p> <p>The web announcement informed the general public about the start of the process and the list of invited organisations. No evidence was found that it was communicated to other stakeholders than the invited ones that they also had the possibility to join the working groups.</p> <p>PEFC DK argued that this was not a requirement in PEFC Technical document annex 2, which was the valid requirement at the time PEFC Denmark started the process. In Annex 2, section 3.4.1 it is required:</p> <p><i>“The process of development of certification criteria shall be initiated by national forest owners’ organisations or national forestry sector organisations having the support of the major forest owners’ organisations in that country. All relevant interested parties will be invited to participate in this process”.</i></p> <p>The consultant accepts this explanation provided by PEFC DK, in combination with the revisions to the standard setting procedures to better comply with this requirement in future.</p>
<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</p>	<p>Procedures</p>	<p>Yes</p>		<p>PEFC DK 008-2, section 5: “The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level... In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”</p> <p>PEFC DK 008-2, section 6: “No single interest can dominate the process, and no single organisation can veto.”</p>
	Process	Yes		<p>Development report: The list of people and organisations in the working groups is provided in Appendix 1 of that report and shows balanced representation covering the relevant stakeholder categories and geographical scope.</p> <p>In the working group minutes no indication was found that the decision making process was dominated by a single interest.</p> <p>There has been a case in the development of the standard where domination of interests played a role: One working group member representing the Danish Forest and Landscape Engineers wished to introduce a requirement that certified forest owners shall employ or contract a person trained in a recognised Danish forestry education institute. Other group members opposed this view after which the member decided directly to stop the dialogue and leave the group. This working group member or his organisation did not re-open the dialogue and did not make use of existing appeal mechanisms or opportunities for public consultation. The consultant has viewed and analysed minutes and e-mail exchange concerning the matter and has observed that the decision was taken in an open and transparent manner. The consultant therefore judges this event to be compliant with procedures.</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	Procedures	Yes		PEFC DK 008-2, section 5: “The invited parties shall represent the different interests relating to sustainable forest management and

Question	Assess. basis*		YES /NO*	Reference to application documents
can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.				<p>can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level... In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The working group shall contain stakeholders:</p> <ul style="list-style-type: none"> - with expertise relevant to the subject matter of the standard - that are materially affected by changes in the standard, - that can influence the implementation of the standard <p>The materially affected stakeholders shall represent a meaningful segment of the participants. Supplementary experts (scientist and other experts) can be invited in order to impart the necessary knowledge.”</p>
	Process	Yes		<p>Development report: The list of people and organisations in the working groups is provided in Appendix 1 and shows that at least 50% of the members represent materially affected stakeholders.</p> <p>The PEFC DK Board decided in its 41st meeting on 4 November 2010 that the 11 stakeholder groups that applied for a position in the working group jointly represented the most important interest groups in Denmark and to a sufficient extent. Especially the chair of the working groups was selected based on impartiality, factual knowledge of the matter and process oriented qualities.</p>
4.5 The standardising body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders.	Procedures	Yes		<p>PEFC DK 008-2, section 10: “PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark’s</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint to the complainant, - gather and verify all necessary information to validate the complaint - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark. - Based on the recommendation from the appeal committee decide on the appeal - Formally announce the result and information about the complaint procedure to the complainant.”
	Process	Yes		PEFC DK 008-1 has been publicly available on www.pefc.dk (accessed on 7-9-2012) and was thus accessible to stakeholders.
4.5 Upon receipt of the complaint, the standard-setting body shall:				
a) acknowledge receipt of the complaint to the complainant,	Procedures	Yes		PEFC DK 008-2, section 10: “PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark’s web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the

Question	Assess. basis*		YES /NO*	Reference to application documents
				complaint, the board of directors of PEFC Denmark shall: - acknowledge receipt of the complaint to the complainant”
	Process	Yes		PEFC Denmark states there have been no complaints regarding the standardising activities of this revision. Also from the international stakeholder consultation nor the survey carried out by the consultant no indications of complaints were found.
b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint, and	Procedures	Yes		PEFC DK 008-2, section 10: “PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark’s web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall: ... - gather and verify all necessary information to validate the complaint - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark. - Based on the recommendation from the appeal committee decide on the appeal ”
	Process	Yes		PEFC Denmark states there have been no complaints regarding the standardising activities of this revision. Also from the international stakeholder consultation nor the survey carried out by the consultant no indications of

Question	Assess. basis*		YES /NO*	Reference to application documents
				complaints were found.
c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	Procedures	Yes		PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall: ... - Formally announce the result and information about the complaint procedure to the complainant."
	Process	Yes		PEFC Denmark states there have been no complaints regarding the standardising activities of this revision. Also from the international stakeholder consultation nor the survey carried out by the consultant no indications of complaints were found.
4.6 The standardising body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	Procedures	Yes		PEFC DK 008-2, section 10: "PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark's web page."
Standard-setting process				
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	Yes		PEFC DK 008-2, section 5: "All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The invited parties shall represent the different interests relating to

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level... The board of PEFC Denmark defines the groups of stakeholders before the establishment of the working groups, based on a stakeholder mapping identifying relevant stakeholders related to the subject of the revision. The mapping exercise shall identify disadvantaged and key stakeholders and their key interest and what means of communication will best reach them. The composition of the group will depend on the areas and tasks to be handled by the group.”</p>
	Process	Yes		<p>Development report: “PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page.</p> <p>In the 40th PEFC DK board meeting of 7 September 2010 the list of organisations to invite for the working groups was decided on. No evidence was found that stakeholder mapping or a similar procedure was applied for stakeholder identification.</p> <p>However, PEFC Denmark started the standard setting process in 2010 and the PEFC requirements at that time did not require stakeholder mapping or a similar detailed stakeholder analysis. The consultant therefore judges the process to be compliant with the PEFC requirements that were valid in 2010.</p> <p>PEFC DK has argued in addition that the board discussed the list of stakeholders prepared by the secretariat, the key stakeholders were identified and some few other stakeholders that could have interest in the revision were added to the list of</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>stakeholders.</p> <p>This argumentation and the revision of the standard setting procedures PEFC DK 008-2 are sufficient proof that the available procedures have been observed and in future the right procedures are clear and can be followed.</p>
<p>5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.</p>	Procedures	Yes		<p>PEFC DK 008-2, section 5: “All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level. ... The board of PEFC Denmark defines the groups of stakeholders before the establishment of the working groups, based on a stakeholder mapping identifying relevant stakeholders related to the subject of the revision. The mapping exercise shall identify disadvantaged and key stakeholders and their key interest and what means of communication will best reach them. The composition of the group will depend on the areas and tasks to be handled by the group.”</p>
	Process	Yes		<p>Development report: “PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page.</p> <p>The consultant is not aware of any disadvantaged groups in the Danish society that need special procedures in order to be reached or enabled to participate, which makes the defined procedure sufficient.</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				35 key stakeholders have been identified and proactively approached by PEFC Denmark.
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>PEFC DK 008-2, section 4: "The initiation of the revision and development of new standards shall be publicly announced in a suitable manner (though homepage, news letters etc.)."</p> <p>PEFC DK 008-2, section 5: "Stakeholders shall be given at least one month to nominate their representative to the working groups"</p> <p>PEFC DK 008-2, section 7: "In connection with the start of the process the possibility to participate in the process shall be announced through an open invitation together with the possibility to comment on the procedures for development and revision of the standard."</p>
	Process	Yes		<p>Development report: "PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page.</p> <p>The direct invitations to stakeholders conform with the procedures and with a month response time. The web announcement did include a weblink to the standard setting procedures, which describes the process and public consultation options, but did not include an open invitation for participation in the working groups.</p> <p>The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation in the working groups. This is sufficient corrective action to comply in future with the current requirements.</p>
5.3 The announcement and invitation shall include:				
a) information about the objectives, scope	Procedures	Yes		PEFC DK 008-2, section 5:

Question	Assess. basis*		YES /NO*	Reference to application documents
and the steps of the standard-setting process and its timetable,				<p>“The invitation shall include:</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”
	Process	Yes		The invitation letters and web announcement include objective and scope. The total time expected for the process is given. The steps are not described, but a weblink was provided to the standard setting procedure PEFC DK 008-1, which also covers the process steps.
b) information about opportunities for stakeholders to participate in the process,	Procedures	Yes		<p>PEFC DK 008-2, section 5:</p> <p>“The invitation shall include:</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”
	Process	Yes		The announcement on the web mentions that selected stakeholders

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>have been invited, but the announcement does not contain an invitation to stakeholders that are not on the list developed by PEFC DK.</p> <p>The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation of any interested party in the working groups. This is sufficient corrective action to comply in future with the current requirements.</p>
<p>(c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,</p>	Procedures	Yes		<p>PEFC DK 008-2, section 5:</p> <p>“The invitation shall include:</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”
	Process	Yes		<p>The announcement on the web mentions that selected stakeholders have been invited, but the announcement does not contain an invitation to stakeholders that are not on the list developed by PEFC DK.</p> <p>The inclusion of this open invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation of any interested party in the working groups. This is sufficient corrective action to comply in future with the current</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				requirements.
d) an invitation to comment on the scope and the standard-setting process, and	Procedures	Yes		<p>PEFC DK 008-2, section 5: “The invitation shall include:</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”
	Process	Yes		<p>The web announcement does not contain an invitation to comment on the scope and the standard setting process.</p> <p>The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require an invitation to comment on the scope and the standard-setting process. This is sufficient corrective action to comply in future with the current requirements.</p>
e) reference to publicly available standard-setting procedures.	Procedures	Yes		<p>PEFC DK 008-2, section 5: “The invitation shall include:</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups,

Question	Assess. basis*		YES /NO*	Reference to application documents
				<ul style="list-style-type: none"> - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.”
	Process	Yes		The web announcement contained a weblink to the standard setting procedures PEFC DK 008-2. Also the invitation letters were accompanied with PEFC DK 008-2.
5.4 The standardising body shall review the standard-setting process based on comments received from the public announcement and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting.	Procedures	Yes		<p>PEFC DK 008-2, section 5: “In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The board of PEFC Denmark compiles the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”</p> <p>PEFC DK 008-2, section 7: “The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”</p>
	Process	Yes		<p>All 11 stakeholders interested in participating in the revision were included in the working group. This was evidenced in the minutes of the 41st PEFC DK Board meeting of 4 November 2011 and justified based on balanced representation.</p> <p>The consultant understands that the PEFC DK Board accepted in its 40th</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>meeting a revised version of the standard setting procedures PEFC DK 008-1, which had been revised to comply with PEFC ST 1001:2010. It is unclear who was responsible for the revision. There is no evidence that the procedure has been opened for public consultation and reviewed based on stakeholder comments.</p> <p>PEFC DK clarified in its response to the first interim report:</p> <p>“At the 40th board meeting the revision of the standard setting procedures PEFC DK 008-1, was not thoroughly revised. Only new reference to PEFC Council revised document was amended.</p> <p>Since it was not a requirement to give stakeholders possibility to comment, nor a requirement to review the procedures it has not been explicitly done.”</p> <p>PEFC DK complied with PEFC procedures that were the applicable requirements at the time standard setting started in 2010. Meanwhile the procedures have been adjusted to comply with current PEFC requirements, which is sufficient to ensure compliance with PEFC procedures in future.</p>
5.5 The work of the working group/committee shall be organised in an open and transparent manner where:				
a) working drafts shall be available to all members of the working group/committee,	Procedures	Yes	PEFC 008-2, section 9: “All working drafts and final documents relevant for the task of revision shall be available for all members of the working group”	
	Process	Yes	<p>Development report: table 2 lists working documents that have been made available to working group members.</p> <p>This is confirmed by working group members in the stakeholder survey</p>	
b) all members of the working group shall be provided with meaningful opportunities to contribute to the development or	Procedures	Yes	PEFC 008-2, section 6: “The work in the working group shall be based on an open dialog and understanding and	

Question	Assess. basis*		YES /NO*	Reference to application documents
revision of the standard and submit comments to the working drafts, and				shall be organised in a way that: ... - 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”
	Process	Yes		Development report: table 2 provides a list of meetings, communication and decisions that show that meaningful opportunities have been provided. This is confirmed by minutes and responses from working group members that participated in the stakeholder survey.
c) comments and views submitted by any member of the working group/committee shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded.	Procedures	Yes		PEFC 008-2, section 6: “The work in the working group shall be based on an open dialog and understanding and shall be organised in a way that: ... - comments and views submitted by any member of the working group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded”
	Process	Yes		Development report: table 2 provides an overview of the minutes that have been kept of the meetings. Several minutes have been reviewed and contained detailed accounts of discussions, resolution of varying views and decision making.
5.6 The standardising body shall organise a public consultation on the enquiry draft and shall ensure that:				
a) the start and the end of the public consultation is announced in a timely manner in suitable media,	Procedures	Yes		PEFC DK 008-2, section 7: “Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days. Information about the consultation shall be sent directly to all stakeholders identified as relevant at the start of the process. Identified disadvantaged and key stakeholders shall be reach

Question	Assess. basis*		YES /NO*	Reference to application documents
				through the way of communication identified at the stakeholder mapping. The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated. A summary of the received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."
	Process	Yes		<p>Development report, public consultation: "The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September. Mail was sent to all relevant stakeholders. An open seminar took place at the 21st of September, where the revised documents were presented and where it was possible to raise questions to the working groups.</p> <p>The consultant confirmed this information in the web announcement, press release of the seminar and invitation letters sent out to the stakeholders.</p>
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		<p>PEFC DK 008-2, section 7:</p> <p>"Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days. Information about the consultation shall be sent directly to all stakeholders identified as relevant at the start of the process. Identified disadvantaged and key stakeholders shall be reached through the way of communication identified at the stakeholder mapping. The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated. A summary of the</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."
	Process	Yes		Development report, public consultation: "The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September. Mail was sent to all relevant stakeholders. An open seminar took place at the 21st of September, where the revised documents were presented and where it was possible to raise questions to the working groups." The consultant confirmed this information in the web announcement, invitation mails and press release of the seminar. In Denmark no disadvantaged stakeholders are defined.
c) the enquiry draft is publicly available and accessible,	Procedures	Yes		PEFC DK 008-2, section 9: "The following shall be observed to ensure transparency in the process: • All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time."
	Process	Yes		Development report, public consultation: "The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September." The web announcement was viewed on PEFC DK website.
d) the public consultation is for at least 60	Procedures	Yes		PEFC DK 008-2, section 7: "Thoroughly prepared drafts for new or

Question	Assess. basis*		YES /NO*	Reference to application documents
days,				revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days.”
	Process	Yes		Development report, public consultation: “The public consultation, concerning the revised documents, took place from the 2nd of September 2011 to the 4th of November 2011. The public consultation was announced at the web-page on the 2nd September.” The web announcement was viewed on PEFC DK website.
e) all comments received are considered by the working group/committee in an objective manner,	Procedures	Yes		PEFC DK 008-2, section 7: “The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated.”
	Process	Yes		Development report: “With the comments received during the public hearing the board decided the 23rd of November 2011 to submit the documents to a second processing in the working groups. All comments received during the consultation was published at the web-page before the comments was discussed in the working groups.” Comments from 15 stakeholders were received and objectively considered in a new working group process, evidenced in web publications, the board decision taken on 23 November 2011 and documentation of revisions to the standard in working documents: “PEFC DK 001-X SkovstandardUDKAST4” and “udestænder”. On request, PEFC DK provided the following comment: “The comments were gathered in a document (Hørringsamlet). First it was discussed at Board-level, where it was decided to send the documents to the working groups to discuss and handle the comments received. Most of the comments was for the forest management standard and the

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>received comments was discussed and agreed at the working group at the 8th meeting.</p> <p>For the more technical documents we had a meeting with Danak, where after working group 2 was informed and through mail correspondence they agreed about the changes.</p> <p>For all the comments received there was created answers to the comments, which was gathered in (HøringsvarsamletPEFC bemærk2) and was published at the webpage when we announced the application for the re-endorsement as a news on the web page (http://www.pefc.dk/site/115/390/).</p> <p>Everybody that commented on our scheme got at mail back thanking them for their contribution and they where told about the process forward."</p>
(f) a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.	Procedures	Yes		PEFC DK 008-2, section 7: "A summary of the received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."
	Process	Yes		PEFC DK comment: "For all the comments received there was created answers to the comments, which was gathered in (HøringsvarsamletPEFC bemærk2) and was published at the webpage when we announced the application for the re-endorsement as a news on the web page (http://www.pefc.dk/site/115/390/)."
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.	Procedures	Yes		PEFC DK 008-2, section 8: "For revised standards new elements shall be tested in the field, if the working group believes that previous experience from certification can not substitute for this. Results form pilot testing and field test shall be published at PEFC Denmark's web page. Experiences gained at pilot testing and field test shall be incorporated in to the final standard."

Question	Assess. basis*		YES /NO*	Reference to application documents
	Process	Yes		<p>PEFC DK states no pilot testing was deemed necessary due to the limited nature of changes in the standards.</p> <p>PEFC DK comment: "The Danish scheme has worked for 10 years and the changes in the forestry standard is not changed in a way that will require new pilot test. It was discussed in the working group and in the board and nobody found a need for pilot testing."</p>
5.8 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus.	Procedures	Yes		PEFC DK 008-2, section 6: "The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus."
	Process	Yes		<p>Development report: "The final draft, approved in the working groups, was approved by the board at the 28th of March 2012."</p> <p>PEFC DK commented: "The last changes were agreed at the 8th meeting and the agreed changes can be seen in PEFC DK 001-X SkovstandardUDKAST4. Few issues was still not agreed and suggestion for new text was prepared by the representatives from the Nature protection organization and Danish Forest owners association and was then presented and agreed upon by the full group through mail correspondence."</p> <p>The consultant has reviewed the mail correspondence and found no opposing views to the latest modifications. Also in the stakeholder survey no sustained opposition was encountered.</p>
5.8 In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition:				
a) a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,	Procedures	Yes		<p>PEFC DK 008-2, section 6: "In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues:</p> <ul style="list-style-type: none"> - a face-to face meeting in the working

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>group where the chair through agreed voting procedures can conclude that there is no opposition</p> <ul style="list-style-type: none"> - a telephone conference where there is a verbal yes/no vote, - an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response.”
	Process	Yes		<p>Development report, the Work at the working groups: “Meetings were placed at different meeting places in different parts of the country in order to spread the travel cost among members. All members where encouraged to sent written comments to the documents if they where not able to participate in the meetings. Working group 1 carried out the revision of the Forest Management Standard and the Terms and definitions. This group had 8 joint meetings. A part of the final corrections and clarifications was executed through mail. Working group 2 carried out the revision of the remaining normative and technical documents. This group held 2 joint meetings during the revision. The main part of the subsequent communication was executed through mail, due to an agreement by the participants.”</p> <p>This process was confirmed in working group minutes.</p> <p>Samples of e-mail discussions from working group 1 and 2 were reviewed in which members indicated their agreement.</p>
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures	Yes		<p>PEFC DK 008-2, section 6: “In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues:</p> <ul style="list-style-type: none"> - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>is a verbal yes/no vote,</p> <ul style="list-style-type: none"> - an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response.”
	Process	N/A		PEFC DK indicates this option was not used.
c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or	Procedures	Yes		<p>PEFC DK 008-2, section 6: “In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues:</p> <ul style="list-style-type: none"> - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there is a verbal yes/no vote, - an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response.”
	Process	Yes		<p>Development report, the Work at the working groups: “Meetings were placed at different meeting places in different parts of the country in order to spread the travel cost among members. All members where encouraged to sent written comments to the documents if they where not able to participate in the meetings. Working group 1 carried out the revision of the Forest Management Standard and the Terms and definitions. This group had 8 joint meetings. A part of the final corrections and clarifications was executed through mail. Working group 2 carried out the revision of the remaining normative and technical documents. This group held 2 joint meetings during the revision. The main part of the subsequent communication was executed through mail, due to an agreement by the participants.”</p> <p>Samples of e-mail discussions from</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				working group 1 and 2 were reviewed in which members indicated their agreement.
d) combinations thereof.	Procedures	Yes		PEFC DK 008-2, section 6: "In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues: - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there is a verbal yes/no vote, - an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response."
	Process	Yes		See evidence above under 5.8a and c: physical meetings and e-mail were used to reach consensus.
5.9 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):				
a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,	Procedures	Yes		PEFC DK 008-2, section 6: "When there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through: a) Discussion and negotiation internally in the working group, attempting to find a compromise. b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern. c) The appeal mechanism described in section 10."
	Process	Yes		A few critical issues were negotiated, for example on clear felling. Evidence is provided about the discussions and

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>reaching consensus on this issue.</p> <p>There is one reported case of sustained opposition. One working group member representing the Danish Forest and landscape Engineers wished to introduce a requirement that certified forest owners shall employ or contract a person trained in a recognised Danish forestry education institute. Other group members opposed this view after which the member decided directly to stop the dialogue and leave the group. This stakeholder group did not re-open the dialogue and did not make use of existing appeal mechanisms or opportunities for public consultation.</p> <p>In this case the complaint and dispute mechanism was not made use of, but working group minutes and e-mail exchange make clear that this option was not pursued by the working group member himself. PEFC DK has been compliant with its procedures.</p>
<p>b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,</p>	Procedures	Yes		<p>PEFC DK 008-2, section 6: "When there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through:</p> <p>a) Discussion and negotiation internally in the working group, attempting to find a compromise.</p> <p>b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern.</p> <p>c) The appeal mechanism described in section 10."</p>
	Process	Yes		<p>A few critical issues were negotiated in the working group meetings, for example on clear felling. Evidence is provided about the discussion and reaching consensus on the debated issues, in the minutes and samples of e-mails.</p>
c) dispute resolution process.	Procedures	Yes		<p>PEFC DK 008-2, section 6: "When</p>

Question	Assess. basis*	YES /NO*	Reference to application documents
			<p>there is a sustained opposition to substantial issues by an important part of the concerned interests, the opposition must be motivated and the conflicting issues shall be resolved through:</p> <p>a) Discussion and negotiation internally in the working group, attempting to find a compromise.</p> <p>b) Direct negotiation between the stakeholder(s) providing the opposition and stakeholders with conflicting opinions about the issue of concern.</p> <p>c) The appeal mechanism described in section 10.”</p> <p>PEFC DK 008-2, section 10: “PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark’s web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated. Upon receipt of the complaint, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint to the complainant, - gather and verify all necessary information to validate the complaint - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark. - Based on the recommendation from the appeal committee decide on the appeal - Formally announce the result and information about the complaint

Question	Assess. basis*		YES /NO*	Reference to application documents
				procedure to the complainant.”
	Process	Yes		The appeal mechanism has not been used, because there were no disputes or complaints submitted.
5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.	Procedures	Yes		<p>PEFC DK 008-2, section 9: “The following shall be observed to ensure transparency in the process:</p> <ul style="list-style-type: none"> • A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmark's homepage • All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time. • All documents shall be kept for a minimum of five years and shall be available to interested parties upon request.”
	Process	Yes		The development report and several working documents were published on the PEFC DK website together with the revised scheme documentation.
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	Procedures	Yes		<p>PEFC DK 008-2, section 4: “The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority.”</p> <p>PEFC DK 008-2, section 6: “The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus.”</p>
	Process	Yes		Development report, the board of PEFC Denmark: “The board held the main responsibility for the execution of the revision. The board commented on the drafts of the revised documents made by the working groups, before the documents were released for the public hearing. The board also has the responsibility of the final approval of the documents before they are passed

Question	Assess. basis*		YES /NO*	Reference to application documents
				<p>on to PEFC International's process of endorsement."</p> <p>Development report, final approval of the revised scheme: "The final draft, approved in the working groups, was approved by the board at the 28th of March 2012."</p> <p>This is evidenced in the Board meeting's minutes. The minutes include reference that the Board determined that all standard setting procedures had been followed, which includes consensus as the basis for approval.</p>
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Procedures	Yes		<p>PEFC DK 008-2, section 9: "The following shall be observed to ensure transparency in the process:</p> <ul style="list-style-type: none"> • A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmark's homepage • All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time. • All documents shall be kept for a minimum of five years and shall be available to interested parties upon request."
	Process	Yes		<p>PEFC DK communicated that the revised scheme documentation was published on the PEFC DK website on 2 May 2012.</p> <p>Documents were found on the website.</p>
Revisions of standards/normative documents				
6.1 The standards/normative documents shall be reviewed and revised at intervals that do not exceed a five-year period. The procedures for the revision of the standards/normative documents shall follow those set out in chapter 5.	Process	Yes		<p>Development report: PEFC Denmark has carried out its second revision. The first revision was revised and endorsed in March 2008, with expiry date in March 2013. The second revision process started in September 2010 and lasted until March 2012. This is within the 5 year revision period.</p>

Question	Assess. basis*		YES /NO*	Reference to application documents
				The procedures in PEFC DK 008-1 for revision did not follow those in chapter 5 in all cases, but procedures were compliant with the PEFC requirements that were valid at the start of the revision process. In the revised version PEFC DK 008-2 the requirements in chapter 5 are met.
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	Process	Yes		Danish Scheme doc, section 11: "Unless specified otherwise in the standards under the Danish scheme, the transition period for implementation of changes to standards under the Danish scheme are one year from the time the standard has been approved by PEFC Council. New certificates issued after the [insert date of endorsement by PEFC Council] shall be issued according to the revised standards." This conforms provided that the application date will be inserted right after PEFC endorsement.
6.3 The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training.	Process	Yes		Danish Scheme doc, section 11: "Unless specified otherwise in the standards under the Danish scheme, the transition period for implementation of changes to standards under the Danish scheme are one year from the time the standard has been approved by PEFC Council. New certificates issued after the [insert date of endorsement by PEFC Council] shall be issued according to the revised standards."
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.	Process	Yes		One year transition period is applied

3 APPLICATION DOCUMENTATION

The application for the endorsement and mutual recognition as defined in Chapter 5 of Annex 7 (*Endorsement and Mutual Recognition of National Schemes and their Revision*) shall include information which enables the assessment of the applicant scheme's compliance with the PEFC Council requirements.

The application documentation should identify and make reference to other detailed documentation such as minutes, internal procedures and rules, reports, etc. which do not need to create a part of the application documentation.

Asses. basis* The standard setting is assessed against the PEFC Council requirements in two stages: (i) compliance of written standard setting procedures (“Procedures”) and (ii) compliance of the standard setting process itself (“Process”).

For “Procedures” the applicant should refer to the part(s) of its standard setting procedures related to the respective PEFC requirement. For “Process” the applicant should either refer to the report/records of the standard setting process forming a part of the submitted application documents, or describe how the PEFC requirement was fulfilled during the standard setting process.

YES/NO* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

PART II: MINIMUM REQUIREMENTS CHECKLIST FOR GROUP FOREST MANAGEMENT CERTIFICATION (PEFC ST 1002:2010)

1 SCOPE

Part II covers requirements for group forest management certification as defined in PEFC ST 1002:2010, *Group Forest Management Certification – Requirements*.

2 CHECKLIST

Question	YES / NO*	Reference to scheme documentation
General		
4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:		
a) the group organisation,	NO	<p>PEFC DK 007-2, section 2: "Group certification of forest management: Certification of forest management of a group of small and medium sized forest owners under one certificate."</p> <p>PEFC DK 003-4, section 5.5: "The group leader shall describe the structure of the organisation in relation to the activity as a group administrator, for example in an organisation chart. Procedures, roles, rights and duties for the work as a group leader shall be defined and distributed by the group leader. The management shall provide the necessary resources in order to carry out the work."</p> <p>The requirement demands a clear definition for group organization and this is not present in the standard. Also, there is no figure showing the relations between group leader, participants and organization, like in the PEFC International standard, so this cannot serve as a substitute. For clarity purposes the group organisation shall be defined.</p>
b) the group entity,	YES	<p>PEFC DK 007-2, section 2: "Group leader: is an organisation that organises and administers certification of groups of forest properties under the Danish PEFC scheme. The group leader represents all the group members in the group in relation to the certifying body and is responsible for ensuring compliance with the requirements from PEFC-Denmark."</p>
c) the participant,	YES	<p>PEFC DK 007-2, section 2: "Group members: Forest properties, which have signed a written agreement with a group leader about participation in a group certificate and are prepared to implement the requirements in the Danish PEFC scheme."</p>
d) the certified area,	YES	<p>PEFC DK 007-2, section 2: "Certified forest: A forest area to which an independent certification body has granted certification or an area included in a group certificate."</p> <p>PEFC DK 001-3, section 2: "The criteria in the standard apply for the following types of areas:</p> <ul style="list-style-type: none"> - Forest areas designated as forest reserve land - Other forested areas

Question	YES / NO*	Reference to scheme documentation
		<p>- Open nature areas, which constitute an integrated part of the forest or forest property The criteria in the standard CANNOT be applied for the following types of areas:</p> <ul style="list-style-type: none"> - Agricultural land in rotation - Gardens, parks and yards belonging to the property <p>As a basis, all the certifiable area of a property shall be included in the certification. The owner can choose to excise parts of the property from the certificate. Coherent forest areas under one property cannot be excised."</p>
e) the group forest certificate, and	YES	<p>PEFC DK 007-2, section 2: "Group certification of forest management: Certification of forest management of a group of small and medium sized forest owners under one certificate." "Certificate: A document issued under the rules of a certification system, providing confidence that a duly identified product, process, or service, is in conformity with a specified standard or other normative document."</p>
f) the document confirming participation in group forest certification.	YES	<p>PEFC DK 007-2, section 2: "All group members in a group shall have a legal or contractual connection to the group leader and be the subject to supervision from the group leader to secure the compliance with PEFC-Denmark's Forest Management Standard." "Forest management proof: The group leader issues a forest management proof to all group members participation in a group certification. A forest management proof is not the same as a certificate." PEFC DK 003-4, section 5.4: "For each group member a written agreement for participation in the group certification shall exist between the forest owner (or an authorized representative of the owner) and the group leader, which ensures an organisational or contractual connection that commits the forest owner to meet the requirement in PEFC Denmark's Forest Management Standard."</p>
4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification scheme is addressed in any other forest management certification scheme that covers the forest owner.	YES	<p>PEFC DK 003-4, section 6: "8) If there is participation in several PEFC groups or upholding of an individual PEFC certificate, all the deviations identified during internal or external audits shall be announced to the remaining group leaders/ certification bodies with whom the forest is certified with."</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	YES	<p>PEFC DK 003-4, section 5.3: "Group leaders administer and organise group certification of forest properties. In doing so the group leader shall carry out the following functions:</p> <ul style="list-style-type: none"> • Through a contractual connection and control ensure that the managements of the group

Question	YES / NO*	Reference to scheme documentation
standard is centrally administered and is subject to central review and that all participants shall be subject to the internal monitoring programme.		<p>members' forests comply with the requirements in PEFC Denmark's Forest Management Standard.</p> <ul style="list-style-type: none"> • Develop and operate an internal audit programme for internal annual audits of the group members and of the central administrative functions of the group leader, prior to the certification body starts its assessment. • Based on the results of the internal and external audits, undertake corrective and preventive measures in case of identified deviations in the associated forests or the administrative system of the group leader. Subsequently the efficiency of the corrective and preventive measures is evaluated."
4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.	YES	<p>PEFC DK 003-4, section 5.7: "The group leader shall conduct internal audits of the management system at least annually. These shall cover all requirements in this guideline and conduct corrective and preventive actions if necessary." "The group leader shall carry out internal audits of the group members at least once a year, so that it can be rendered probable that the individual group members comply with the requirements in PEFC Denmark's Forest Management Standard. The internal audit shall be based on a sample among the group members. The group leader shall define a strategy of sampling, so that at least a number of group members equal to the square root of the number of all group members in the group, take part in the yearly audit. When planning the internal audits and the selection of group members in that regard, the following shall be taken into consideration:</p> <ul style="list-style-type: none"> - The result from previous internal audits - Received comments - The variation of size of the properties - Geographical distribution - The association of the forest to the group in other regards" <p>PEFC DK 003-4, section 5.3: "Based on the results of the internal and external audits, undertake corrective and preventive measures in case of identified deviations in the associated forests or the administrative system of the group leader. Subsequently the efficiency of the corrective and preventive measures is evaluated."</p>
Functions and responsibilities of the group entity		
4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:		
a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the	YES	<p>PEFC DK 003-4, section 5.3: "Group leaders administer and organise group certification of forest properties." PEFC DK 003-4, section 4: "The group leader represents all the group members in the group in relation to the certifying body"</p>

Question	YES / NO*	Reference to scheme documentation
certification body;		<p>“the group leader shall carry out the following functions: [...] To immediately inform the certification body and PEFC Denmark about issued, terminated, suspended and withdrawn forest management proofs in written.”</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;	YES	<p>PEFC DK 003-4, section 4:</p> <p>“Group leader: is an organisation that organises and administers certification of groups of forest properties under the Danish PEFC scheme. The group leader represents all the group members in the group in relation to the certifying body and is responsible for ensuring compliance with the requirements from PEFC- Denmark.”</p> <p>PEFC DK 003-4, section 5.3:</p> <p>“the group leader shall carry out the following functions: [...] Through a contractual connection and control ensure that the managements of the group members’ forests comply with the requirements in PEFC Denmark’s Forest Management Standard.”</p>
c) To establish written procedures for the management of the group organisation;	YES	<p>PEFC DK 003-4, section 5.2:</p> <p>“It shall be demonstrated that the company has established a management system in accordance with this standard (section 5.3 – 5.10).”</p> <p>With the company the group leader is meant.</p> <p>PEFC DK 003-4, section 5.6:</p> <p>“The group leader shall implement and maintain procedures for managing all documents and registrations required by the present document. [...]. As a minimum the following routines shall be described:</p> <ul style="list-style-type: none"> • The entering of the agreement regarding participation in the group certification. • Issuance of forest managements proofs. • Guidelines for collection of the documentation required in PEFC Denmark’s Forest Management Standard section 7.4 from the group members. • Procedures in connection with conveyance of property or parts of property. • Termination of agreement for participation in the group. • Collection of remarks and observations received from external parties. • Planning and implementation of internal audits. • Handling of deviations and corrective actions. (annex 1) • Document handling and filing procedures, including a register with issued forest management proofs containing information as required in section 5.3, continuous reporting of certification agreement to PEFC Denmark and filing of important documents or documents that may be important in relation to the completion of the certification. (An example is provided in annex 2). • Other routines of interest for the administration of the group certification.”

Question	YES / NO*	Reference to scheme documentation
<p>d) To keep records of:</p> <ul style="list-style-type: none"> - the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme, - all participants, including their contact details, identification of their forest property and its/their size(s), - the certified area, - the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken; 	YES	<p>PEFC DK 003-4, section 5.3: "the group leader shall carry out the following functions:[...]" <ul style="list-style-type: none"> • Issuing of forest management proofs with reference to a valid group certificate issued to the group leader. • Through a contractual connection and control ensure that the managements of the group members' forests comply with the requirements in PEFC Denmark's Forest Management Standard. • To handle a register of the certified forest properties containing the following information regarding each group member: <ul style="list-style-type: none"> - Name of the forest property - Name and address of the forest owner - Name of contact person - Phone number (contact person) - Mail address (contact person) - The date of the agreement coming into force - The date of expiry of the agreement - Number of the forest management proof - The size of the certified area" <p>PEFC DK 003-4, section 5.6: "As a minimum the following routines shall be described:</p> <ul style="list-style-type: none"> • The entering of the agreement regarding participation in the group certification. • Issuance of forest managements proofs. • Guidelines for collection of the documentation required in PEFC Denmark's Forest Management Standard section 7.4 from the group members. • Procedures in connection with conveyance of property or parts of property. • Termination of agreement for participation in the group. • Collection of remarks and observations received from external parties. • Planning and implementation of internal audits. • Handling of deviations and corrective actions. (annex 1) • Document handling and filing procedures, including a register with issued forest management proofs containing information as required in section 5.3, continuous reporting of certification agreement to PEFC Denmark and filing of important documents or documents that may be important in relation to the completion of the certification. (An example is provided in annex 2). • Other routines of interest for the administration of the group certification. <p>PEFC DK 003-4, section 5.7: "The management of the group leader shall at least annually go through the reports from the internal audits."</p> </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</p>	YES	<p>PEFC DK 003-4, section 5.4: "For each group member a written agreement for participation in the group certification shall exist between the forest owner (or an authorized representative of the owner) and the group leader, which ensures an organisational or contractual connection that</p>

Question	YES / NO*	Reference to scheme documentation
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>commits the forest owner to meet the requirement in PEFC Denmark's Forest Management Standard.”</p> <p>“3. It is the duty of the group member to comply with Danish legislation concerning forestry, PEFC Denmark's Forest Management Standard and other directions put forward by the group leader in order to maintain membership of the group.”</p> <p>“5. The agreement shall include the right of the group leader to exclude any group member from participation in the group in case of repeated major deviations from PEFC Denmark's Forest Management Standard.”</p> <p>PEFC DK 003-4, section 6: “By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum:</p> <ol style="list-style-type: none"> 1) PEFC Denmark's Forest Management Standard. 2) Relevant legislation and regulation associated with forestry in Denmark. 3) Control in the form of internal audits performed by the group leader and third party audits performed by a certification body. 4) Responding effectively to all requests from the group leader or certification body for relevant data, documentation or other information whether in connection with formal audits, reviews or otherwise. 5) Providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, relevant routine enquiries or corrective actions. 6) Implementation of relevant corrective and preventive actions established by the group leader.”
f) To provide participants with a document confirming participation in the group forest certification;	YES	<p>PEFC DK 003-4, section 5.4: “For each group member a written agreement for participation in the group certification shall exist between the forest owner (or an authorized representative of the owner) and the group leader”</p> <p>“9. The agreement is made in 2 copies, one for the group member and one for the group leader.”</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;	YES	<p>PEFC DK 003-4, section 5.3: “the group leader shall carry out the following functions: [...]”</p> <ul style="list-style-type: none"> • Provide all applicants with information and guidance needed for effective fulfilment of the requirements in PEFC Denmark's Forest Management Standard. • Continuously inform group members of changes in PEFC Denmark's Forest Management Standard.”
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;	YES	<p>PEFC DK 003-4, section 5.3: “the group leader shall carry out the following functions: [...]”</p> <ul style="list-style-type: none"> • Develop and operate an internal audit programme for internal annual audits of the group members and of the central administrative functions of the group leader, prior to the certification body starts its

Question	YES / NO*	Reference to scheme documentation
i) To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.	YES	assessment." PEFC DK 003-4, section 5.3: "the group leader shall carry out the following functions: [...] • Based on the results of the internal and external audits, undertake corrective and preventive measures in case of identified deviations in the associated forests or the administrative system of the group leader. Subsequently the efficiency of the corrective and preventive measures is evaluated." PEFC DK 003-4, section 5.7: "The management of the group leader shall at least annually go through the reports from the internal audits."
Function and responsibilities of participants		
4.3.1 The forest certification scheme shall define the following requirements for the participants:		
a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	PEFC DK 003-4, section 6: "By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum: 1) PEFC Denmark's Forest Management Standard. 2) Relevant legislation and regulation associated with forestry in Denmark."
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	PEFC DK 003-4, section 6: "By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum: 1) PEFC Denmark's Forest Management Standard. 2) Relevant legislation and regulation associated with forestry in Denmark."
c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise;	YES	PEFC DK 003-4, section 6: "By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum: 3) Control in the form of internal audits performed by the group leader and third party audits performed by a certification body. 4) Responding effectively to all requests from the group leader or certification body for relevant data, documentation or other information whether in connection with formal audits, reviews or otherwise. 5) Providing full co-operation and assistance in respect of the satisfactory completion of internal audits, reviews, relevant routine enquiries or corrective actions."
d) To implement relevant corrective and preventive actions established by the group entity.	YES	PEFC DK 003-4, section 6: "By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum: 6) Implementation of relevant corrective and preventive actions established by the group leader."

PART III: MINIMUM REQUIREMENTS CHECKLIST FOR SUSTAINABLE FOREST MANAGEMENT (PEFC ST 1003:2010)

1 SCOPE

Part III covers requirements for sustainable forest management as defined in PEFC ST 1003:2010, *Sustainable Forest Management – Requirements*.

2 CHECKLIST

Question	YES / NO*	Reference to scheme documentation
General requirements for SFM standards		
4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall		
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.	YES	<p>PEFC DK 001-3, section 2: “The standard can be used to certify any type or size of forest property in Denmark.”</p> <p>“As a basis, all the certifiable area of a property shall be included in the certification. The owner can choose to excise parts of the property from the certificate. Coherent forest areas under one property cannot be excised.”</p> <p>PEFC DK 001-3, section 7: “This section defines the criteria for sustainable forest management in Denmark. The criteria have been grouped in the following 4 subsections: 1. Silviculture 2. Environment and biodiversity 3. Social 4. Management planning The structure of the criteria is: X. – The general grouping of the criteria (section). X.1 – The criteria for sustainable forest management defined by PEFC Denmark. I X.1.1 – Indicators and/or verifiers relating to the above stated criterion.”</p>
b) be clear, objective-based and auditable.	YES	<p>PEFC DK 001-3, section 6: “Overall the criteria form the basis for long term sustainable management of PEFC certified forests [...] the criteria and the indicators associated with them, ensure that it is possible to document the sustainable forest management to a qualified forest auditor.”</p> <p>PEFC DK 001-3, section 7: “The criteria have been grouped in the following 4 subsections: 1. Silviculture 2. Environment and biodiversity 3. Social 4. Management planning The structure of the criteria is: X. – The general grouping of the criteria (section). X.1 – The criteria for sustainable forest management defined</p>

Question	YES / NO*	Reference to scheme documentation
		by PEFC Denmark. I X.1.1 – Indicators and/or verifiers relating to the above stated criterion.”
c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.	YES	<p>PEFC DK 001-3, section 7: “3.3. The forest owner and his employees shall be ready to enter into a dialogue with users and the local community aiming i.e. at ensuring a reasonable: • Planning and exerting of recreation in the forest.”</p> <p>“3.6. The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees have the necessary skills to carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work. The forest owner shall continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.”</p> <p>“3.7. The use of pesticides, including rodenticides, shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.”</p> <p>“3.8. The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. This is ensured through the employees’ and specialized machine operators’ awareness of and compliance with the parts of the policy and objectives relevant for the task. Further the employees and specialized machine operators must have access to the written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task.[...] I 3.8.1. Owner, permanent forest staff and specialized machine operators demonstrate a general knowledge about the PEFC Forest Management Standard and the thereof deflected considerations regarding the forest management relevant for their individual positions. I 3.8.2. Employees and specialized machine operators have knowledge about and access to the written documentation.”</p> <p>“3.9. Other contractors and users of the forest, e.g. hunters, firewood collectors, organizers of recreational activities etc., shall have specific information about protections and designations if it is assessed that the different values are possibly to be affected by the activity.”</p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.	YES	PEFC DK 001-3, section 7.4.2: “A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period. The

Question	YES / NO*	Reference to scheme documentation
		<p>written documentation for the forest property shall be available for the certification body conducting the audit. The documentation can be either an IT based management system, an existing management plan, a green management plan or similar.”</p> <p>PEFC DK 001-3, sections 7.4.2, to 7.4.8 provide further specifications of what certified organisations need to record specifically. These records will provide evidence of compliance.</p>
Specific requirements for SFM standards		
Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle		
<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>	YES	<p>PEFC DK 001-3, section 7.1.1&7.1.2: “1.1 The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area.” “1.2. The long term, stable forest climate of the forest shall be maintained and continuously improved.” <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. Clear cuts shall not be used where a biologically rich nature is characterised by continuity in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable. <input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting.”</p> <p>PEFC DK 001-3, section 7.4.2 f): “Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. Other natural values. E.g. areas with a high biodiversity or with rare plants</p>

Question	YES / NO*	Reference to scheme documentation
		and/or animals, untouched forest, areas with old management practises, § 3 areas not registered by the authorities and areas of a significant size protected by § 28 in accordance to the Forest Act. Can be a 'registration of key woodland habitats, an assessment of natural values' or the owners own registration of the natural values at the property. Historic sites and relics registered by the authorities."
5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.	YES	<p>PEFC DK 001-3, section 7.4: "Forest properties shall establish and maintain a forest planning system, appropriate to the scope and scale of forest management, in order to assess the social, environmental and economic consequences of forest management. The planning system shall include a cycle of calculations and planning, implementation, monitoring and evaluation as described below."</p> <p>PEFC DK 001-3, section 7.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area. Further forest management shall be structured to minimise the risk of degradation of and damages to forest ecosystems. I 1.1.1. Evaluation of the owner's policy and objective. I 1.1.2. Planning as described in section 7.4 is implemented"</p> <p>PEFC DK 001-3, section 7.4.2: "c) A written procedure for the forest owner's yearly evaluation of the forest management relating to the defined policy and objectives, including descriptions of recorded deviations in relation to the standard. d) Forest maps showing certified areas... Each compartment is to be described at least with the following data: o Size o Main species o Extent of important mixed species – description and percentage composition of species if stand is mixed o Age or year of establishment (may be based on professional judgement) o Land use of areas without tree cover"</p> <p>f) Registrations relating to map of: • Designated biodiversity areas, including untouched forest. • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. • Other natural values. [...] • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant. • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation (can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.). • Areas allocated to intensive management practice."</p>

Question	YES / NO*	Reference to scheme documentation
		<p>“I 1.2.1. The use of natural regeneration and other regeneration methods that ensure a continuous forest cover is to be evaluated and justified based on the planting records.</p> <p>I 1.2.2. The use of clear cutting is evaluated on the basis of inspection of newly regenerated areas and justified based on the planting records.</p> <p>I 1.2.3. Evaluation of the balance between harvest and increment.</p> <p>I 1.2.4. Evaluation of the planting records compared with the tree species composition on the property.”</p> <p>“I 1.3.1. Evaluation of guidelines for use of non-wood products from the forest, if such a production takes place.”</p> <p>“I 1.5.3. Evaluation of used active ingredients.</p> <p>I 1.5.4. Evaluation of the location of new intensively managed areas.”</p> <p>“I 1.7.1. Evaluation of use of fertilizer on the property is done on the basis of information in the fertilizing plan.”</p> <p>“I 1.8.1. Evaluation of the use of pesticides on the property is made on the basis of the pesticide application plan seen against the planting records and reason given for the usage.”</p> <p>“I 1.10.2. Evaluation of planting records.”</p> <p>PEFC DK 001-3, section 7.2: “I 2.4.1. Evaluation of whether the areas have been designated after the guidelines and are managed after the maintenance plan.”</p> <p>“I 2.9.1. Evaluation of draining activities carried out.</p> <p>I 2.9.2. Evaluation of the development of the nature types.”</p> <p>“I 2.10.1. Evaluation of used logging, transport and regeneration techniques.</p> <p>I 2.10.2. Evaluation of use and location of skidding tracks, if these are present.”</p> <p>PEFC DK 001-3, section 7.3.6: “The owner of the forest shall supervise and monitor forest management activities [...]”</p> <p>I 3.6.2. Evaluation of the forest owner’s supervision and monitoring of the forest management.”</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>PEFC DK 001-3, section 7.4.2: “d) Forest maps showing certified areas.”</p> <p>“f) Registrations relating to map of:</p> <ul style="list-style-type: none"> • Designated biodiversity areas, including untouched forest. • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. • Other natural values. [...] • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant.

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		<ul style="list-style-type: none"> • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation (can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.). • Areas allocated to intensive management practice.” <p>PEFC DK 001-3, section 7.4.3: “4.3. Documented management records unambiguously referring to the divisions at the forest map: a) Planting records [...] d) Yearly harvest of wood at the certified area.”</p> <p>No requirement was found that forest inventory shall be carried out, but the mapping requirements prior to management require a level of information that can only generated through an inventory, thus sufficiently informing the management plan.</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>PEFC DK 100-3, section 7.4, 7.4.1 & 7.4.2 : “Available knowledge and data from research institutions, forest monitoring and counseling services, as appropriate, shall be used in the planning process and the grant schemes aimed at forestry that promotes forest policies shall be considered.”</p> <p>“4.1. The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard. The objective shall contain: • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management”</p> <p>“The registrations shall be updated regularly and at least for every 10 years period. The written documentation for the forest property shall be available for the certification body conducting the audit. The documentation can be either an IT based management system, an existing management plan, a green management plan or similar.”</p> <p>The standard does not require that management plans shall be based on legislation. PEFC DK states that the Danish forest act does not include requirement for forest management planning at the individual forest property, which is a little atypical compared to other countries in Europe. Forest owners neither are required to get logging permits nor notify the authorities before logging activities can be carried out.</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>Yes</p>	<p>PEFC DK 001-3, section 7.4.1: “4.1. The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard. The objective shall contain: • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management”</p> <p>PEFC DK 001-3, section 7.4.2:</p>

Question	YES / NO*	Reference to scheme documentation
		<p>“d) Forest maps showing certified areas... Each compartment is to be described at least with the following data:</p> <ul style="list-style-type: none"> ○ Size ○ Main species ○ Extent of important mixed species – description and percentage composition of species if stand is mixed ○ Age or year of establishment (may be based on professional judgement) ○ Land use of areas without tree cover <p>e) Determination of the annual allowable cut in the planning period, including justification</p> <p>h) Guidelines for use of non-wood products from the forest, if relevant cf. criterion 1.3.”</p> <p>PEFC DK 001-3, section 7.1.4: “The rate of harvest – both wood and non-wood forest products – must happen in a way that does not affect the long term productivity capacity of the site. For the production of wood, this is secured through compliance with the other requirements stipulated in this standard. If non-wood products from the forest are to be utilized commercially, the owner shall establish guidelines for the management to secure it does not affect the long term production capacity of the site.</p> <p>I 1.3.1. Evaluation of guidelines for use of non-wood products from the forest, if such a production takes place.”</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>NO</p>	<p>Requirements for individual forest properties are as follows:</p> <p>PEFC DK 005-3, section 6.4.4: “The certification report must include:</p> <ul style="list-style-type: none"> - A summary of the hearing of stakeholders - A summary of the report that includes: <ul style="list-style-type: none"> • Main data • Management objectives as required in section 7.4.1 of “PEFC Denmark’s forest management standard – PEFC DK 001-3”(only individually certified forest properties) • Any deviations <p>Confidential and personal information may be excluded from the summary. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these.</p> <p>The summary of the certification report shall be made available to the public by the certification body”</p> <p>For group certified entities the requirement has been added to the responsibility of the group leader and required to be accepted by forest owners:</p> <p>PEFC DK 003-4, section 5.3: “Group leaders administer and organise group certification of forest properties. In doing so</p>

Question	YES / NO*	Reference to scheme documentation
		<p>the group leader shall carry out the following functions:</p> <ul style="list-style-type: none"> - ... - Upon request from stakeholders, provide a summary of the individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard. Confidential and personal information may be excluded. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these.” <p>PEFC DK 003-4, section6: “By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum:</p> <p>7) Upon request from stakeholders, the group leader to provide a summary of the individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard.”</p> <p>Both the requirements for individual properties and group certified properties do not comply with the minimum requirement for a number of reasons:</p> <ul style="list-style-type: none"> • For individual properties the required summary regards the certification report, not the management plan. It is not acceptable that the auditor is the only responsible for publishing the public summary of the management plan, because it is the same auditor that has to verify the conformity of this requirement. This would cause a circular verification process as the auditor would have to check himself. This is not auditable. • For both individual and group certified properties PEFC DK requires as a minimum that management objectives are included in the summary. This is not according to the requirement that the summary shall be appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied.
<p>5.1.7 Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 4.2:</p> <p>“A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period.</p> <p>c) A written procedure for the forest owner’s yearly evaluation of the forest management relating to the defined policy and objectives, including descriptions of recorded deviations in relation to the standard.”</p> <p>PEFC DK 001-3, section 4.3: “Documented management records unambiguously referring to the divisions at the forest map:</p> <p>a) Planting records containing:</p> <p>a. Size of the area</p>

Question	YES / NO*	Reference to scheme documentation
		<p>b. Year (of establishment) c. Planting method – including soil preparation and fencing if any d. Tree species / provenances e. Former tree species b) Yearly consumption of pesticide at property level with a registration of the locations that has received the treatment. – application records c) Yearly consumption of fertilizer at property level with a registration of the locations that has received the treatment. – application records d) Yearly harvest of wood at the certified area.”</p> <p>The certified organisation is required to carry out yearly evaluations, but these may not include all forest resources and management aspects. The preliminary management plan must be revised at least every 10 years, including a description and mapping of the forest resources.</p>
5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	<p>PEFC DK 001-3, section 3.6: “The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work.”</p> <p>PEFC DK 001-3, section 3.8: “The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. This is ensured through the employees’ and specialized machine operators’ awareness of and compliance with the parts of the policy and objectives relevant for the task.”</p> <p>PEFC DK 001-3, section 3.9: “Other contractors and users of the forest, e.g. hunters, firewood collectors, organizers of recreational activities etc., shall have specific information about protections and designations if it is assessed that the different values are possibly to be affected by the activity.”</p>
5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.	YES	<p>PEFC DK 001-3, section 1.3: “The rate of harvest – both wood and non-wood forest products – must happen in a way that does not affect the long term productivity capacity of the site. For the production of wood, this is secured through compliance with the other requirements stipulated in this standard. If non-wood products from the forest are to be utilized commercially, the owner shall establish guidelines for the management to secure it does not affect the long term production capacity of the site.”</p> <p>PEFC DK 001-3, section 7.1.9: “Soil scarification on areas not intensively managed must be limited with respect to the effect on fungi, flora and fauna ... the site.”</p>

Question	YES / NO*	Reference to scheme documentation
		<p>PEFC DK 001-3, section 7.2.10: "Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations."</p> <p>PEFC DK 001-3, section 7.4.5: "Registration of observed damage caused by external factors as well as an evaluating of the effect of these on forest management."</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>PEFC DK 001-3, section 1.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area."</p> <p>PEFC DK 001-3, section 1.2: "The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retaining sufficient stocking density on the property's forest covered area. <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. <p>Clear cuts shall not be used where a biologically rich nature is characterised by continuity in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting. Restocking must take place within 3 growth seasons. <p>This does not prevent establishment and management of open nature areas, areas with coppiced forests, silvopasture and intensive land management and other unconventional woodland practises as long as it come within the scope of the forest act and its exemption possibilities."</p>

Question	YES / NO*	Reference to scheme documentation
<p>5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:</p> <p>a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and</p> <p>b) entails a small proportion of forest type; and</p> <p>c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and</p> <p>d) makes a contribution to long-term conservation, economic, and social benefits.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 1.2: "The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. ... This does not prevent establishment and management of open nature areas, areas with coppiced forests, silvopasture and intensive land management and other unconventional woodland practises as long as it come within the scope of the forest act and its exemption possibilities."</p> <p>PEFC DK 001-3, section 7.1.11: "Exotic species may only be used where they do not threaten significant natural values and are locally adapted. Conversion of the following areas are not allowed:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Stands with an age that significantly exceed normal rotation age for the species and/or <input type="checkbox"/> Stands with a biological rich nature associated with continuity in forest cover and/or stable hydrology and <input type="checkbox"/> Areas with native tree species that can act as buffer-zones or can connect stands"mentioned under the two previous points. <p>If areas with native species are converted to areas with exotic species, a mapping of areas that are not allowed to be converted from native to exotic species shall be carried out beforehand."</p> <p>PEFC DK 001-3, section 2.4: "A minimum of 7.5 % of the total certified area of the property shall be designated as biodiversity area, including untouched forest. Biodiversity areas must primarily be laid out where: <input type="checkbox"/> The conservation of unique biological values requires that the area is left untouched or maintained if this is necessary to preserve or promote the natural values.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Where biodiversity areas, including untouched forest, supports networks (e.g. corridors) in the landscape. <input type="checkbox"/> Where it is to be considered feasible based on an overall ecological, economic and social assessment. <p>The biodiversity areas can not only consist of light open nature types. Where there at the time of certification exist areas with untouched forest or biologically particular valuable forest with very long continuity, these areas shall be preserved and designated and form part of the 7.5 %. Units that once have been designated as untouched forest cannot be replaced by another management system."</p> <p>PEFC DK 001-3, section 2.7: "Rare indigenous species, including red listed₃ species, shall be protected or promoted and are not allowed to be used commercially."</p> <p>PEFC DK 001-3, section 2.8: "Activities impacting negatively</p>

Question	YES / NO*	Reference to scheme documentation
		<p>on particularly vulnerable areas and species should be regulated.”</p> <p>By law (DFA), it is allowed to develop 10% of a managed area as non-forest nature types. This legal requirement contributes to PEFC DK compliance with part b of the PEFC minimum requirement.</p>
<p>5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.1.3: “Planting of abandoned agricultural and other open areas within or in connection with the forest shall be considered, whenever it can add economic, ecological, social and/or cultural value without harming other values significantly.</p> <p>I. 1.3.1: Value for the planting of abandoned agricultural and other open areas within or in connection with the forest is considered.”</p>
<p>5.2.1 Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.1.1: “The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area.”</p> <p>PEFC DK 001-3, section 7.1.2: “The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retaining sufficient stocking density on the property’s forest covered area. <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. <p>Clear cuts shall not be used where a biologically rich nature is characterised by continuity in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting. Restocking must take place within 3 growth seasons.

Question	YES / NO*	Reference to scheme documentation
		<p>- Rehabilitation of degraded forest ecosystems shall be aimed for, whenever this is possible by silvicultural means.</p> <p>This does not prevent establishment and management of open nature areas, areas with coppiced forests, silvopasture and intensive land management and other unconventional woodland practises as long as it come within the scope of the forest act and its exemption possibilities.”</p>
Criterion 2: Maintenance of forest ecosystem health and vitality		
<p>5.2.2 Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>	YES	<p>PEFC DK 001-3, section 7.4.2: “A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period. ... c) A written procedure for the forest owner’s yearly evaluation of the forest management relating to the defined policy and objectives, including descriptions of recorded deviations in relation to the standard.”</p> <p>PEFC DK 001-3, section 7.2.14: “Forest health and vitality shall be regularly monitored in relation to external factors such as pests, diseases, overgrazing, fire or damage caused by climatic factors that can affect forest health and vitality. When damage caused by such factors is determined, the impact of these on forest management shall be assessed. As a basis for the assessment data from national monitoring of forests (NFI) on forests current state and possible threats to forests and other information from Forest & Landscape Knowledge Service can be used.</p> <p>I.2.14.1: Regular monitoring has been carried out I.2.14.2: In the presence of damage, the impact has been assessed.”</p> <p>PEFC DK 001-3, section 7.4.5: “Registration of observed damage caused by external factors as well as an evaluating of the effect of these on forest management.”</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>	YES	<p>PEFC DK 001-3, section 7.1.8: “On the areas not intensively managed, the use of pesticides (including rodenticides) shall be minimized. Appropriate silvicultural alternatives and other biological measures are to be preferred to the use of chemical pesticides (including rodenticides).”</p> <p>PEFC DK 001-3, section 7.2.13: “Invasive species shall be controlled where it is economically and practically possible and especially at the areas designated as biodiversity areas, hereunder untouched forest. The forest owner shall be familiar with the “black list”⁵ and introduction of species on this list is not allowed.”</p> <p>PEFC DK 001-3, section 7.2.15: “Forest fires shall be avoided. Fires might however be used when they are a part of the nature management and necessary to achieve defined objectives. Fire protection plans are recommended and firebreaks should be established at vulnerable sites.”</p> <p>PEFC DK 001-3, section 7.2.17: “Wildlife management shall comply with the principles of multiple management use. This also applies to selection of locally adapted tree species and</p>

Question	YES / NO*	Reference to scheme documentation
		<p>the possibilities for natural regeneration.”</p> <p>PEFC DK 001-3, section 7.4.2: “A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period. ... c) A written procedure for the forest owner’s yearly evaluation of the forest management relating to the defined policy and objectives, including descriptions of recorded deviations in relation to the standard.”</p> <p>PEFC DK 001-3, section 7.2.14: “Forest health and vitality shall be regularly monitored in relation to external factors such as pests, diseases, overgrazing, fire or damage caused by climatic factors that can affect forest health and vitality. When damage caused by such factors is determined, the impact of these on forest management shall be assessed. As a basis for the assessment data from national monitoring of forests (NFI) on forests current state and possible threats to forests and other information from Forest & Landscape Knowledge Service can be used. I.2.14.1: Regular monitoring has been carried out I.2.14.2: In the presence of damage, the impact has been assessed.”</p> <p>PEFC DK 001-3, section 7.4.5: “Registration of observed damage caused by external factors as well as an evaluating of the effect of these on forest management.”</p>
<p>5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.1.1: “The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area. Further forest management shall be structured to minimise the risk of degradation of and damages to forest ecosystems. I.1.1.1: Evaluation of the owner’s policy and objective. I.1.1.2: Planning as described in section 7.4 is implemented”</p> <p>PEFC DK 001-3, section 7.4: “Available knowledge and data from research institutions, forest monitoring and counseling services, as appropriate, shall be used in the planning process and the grant schemes aimed at forestry that promotes forest policies shall be considered.”</p> <p>PEFC DK 001-3, section 7.4.5: “Registration of observed damage caused by external factors as well as an evaluating of the effect of these on forest management.”</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</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.1.2: “The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods.”</p> <p>PEFC DK 001-3, section 7.1.6: “The intensively managed areas must be developed in a nature and environmentally</p>

Question	YES / NO*	Reference to scheme documentation
diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.		<p>friendly way.”</p> <p>PEFC DK 001-3, section 7.1.7: “On the areas not intensively managed the use of fertilizers must be out-phased through adjustment of the cultivation systems.”</p> <p>PEFC DK 001-3, section 7.1.8: “On the areas not intensively managed, the use of pesticides (including rodenticides) shall be minimized. Appropriate silvicultural alternatives and other biological measures are to be preferred to the use of chemical pesticides (including rodenticides).”</p> <p>PEFC DK 001-3, section 7.1.10: “Use of native species shall be promoted in a way that the forested area of the property ultimately will consist of at least 20 % and 55 % of native species, respectively at poor and better soils.”</p> <p>PEFC DK 001-3, section 7.1.12: “Use of genetically modified plants is prohibited. Clones are not allowed as the main tree species at more than 5 % of the forested area.”</p> <p>PEFC DK 001-3, section 7.2.1: “The structure in the forest shall be developed in a way that it contains different tree species at different ages, to create a variation in habitats and a stable and robust forest. Other tree and bush species than the main species must be promoted under cleaning and thinning operations, where this is economically justifiable and where these with advantage can become part of the stand structure.”</p>
5.2.6 Lighting of fires shall be avoided and is only permitted if it is necessary for the achievement of the management goals of the forest management unit.	YES	PEFC DK 001-3, section 7.2.15: “Forest fires shall be avoided. Fires might however be used when they are a part of the nature management and necessary to achieve defined objectives. Fire protection plans are recommended and firebreaks should be established at vulnerable sites.”
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	<p>PEFC DK 001-3, section 7.1.2: “The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retaining sufficient stocking density on the property’s forest covered area. <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. <p>Clear cuts shall not be used where a biologically rich nature is characterised by continuity</p>

Question	YES / NO*	Reference to scheme documentation
		<p>in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable.</p> <p><input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting. Restocking must take place within 3 growth seasons.</p> <p>This does not prevent establishment and management of open nature areas, areas with coppiced forests, silvopasture and intensive land management and other unconventional woodland practises as long as it come within the scope of the forest act and its exemption possibilities.”</p> <p>PEFC DK 001-3, section 7.1.9: “Soil scarification on areas not intensively managed must be limited with respect to the effect on fungi, flora and fauna, so that:</p> <p><input type="checkbox"/> Shallow soil scarification may be carried out on maximum 70 % of the area for regeneration, where this is necessary for ensuring the regeneration or a change in tree species. It is done in a way that secure untreated areas around seed trees, along forest fringes, on wet areas and other biological valuable habitats.</p> <p><input type="checkbox"/> Deep soil preparation may only be carried out sporadically or in rows.</p> <p><input type="checkbox"/> Sporadic and line treatments may only be carried out with an intensity that normal plant spacing would require.</p> <p><input type="checkbox"/> Removal of stumps and deep grounded ploughing is not allowed.</p> <p><input type="checkbox"/> A reason for the choice of method shall be possible to present.”</p> <p>PEFC DK 001-3, section 7.1.10: “Use of native species shall be promoted in a way that the forested area of the property ultimately will consist of at least 20 % and 55 % of native species, respectively at poor and better soils.”</p> <p>PEFC DK 001-3, section 7.1.11: “Exotic species may only be used where they do not threaten significant natural values and are locally adapted. Conversion of the following areas are not allowed:</p> <p><input type="checkbox"/> Stands with an age that significantly exceed normal rotation age for the species and/or</p> <p><input type="checkbox"/> Stands with a biological rich nature associated with continuity in forest cover and/or stable hydrology and</p> <p><input type="checkbox"/> Areas with native tree species that can act as buffer-zones or can connect stands mentioned under the two previous points.”</p> <p>PEFC DK 001-3, section 7.2.10: “Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes</p>

Question	YES / NO*	Reference to scheme documentation
		<p>damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations.”</p> <p>PEFC DK 001-3, section 7.2.12: “The spillage of oil and other substances harmful to the environment, through forest management operations or the indiscriminate disposal of waste on forestland, shall be strictly avoided.”</p> <p>DFA: “11.-(1) On areas designated as forest reserve land it is not allowed to erect buildings, establish installations, or alter the ground surface or deposit waste.”</p>
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	YES	<p>PEFC DK 001-3, section 7.1.6: “The intensively managed areas must be developed in a nature and environmentally friendly way, so that:</p> <p><input type="checkbox"/> The use of pesticides and fertilizer is minimal and environmentally responsible.”</p> <p>PEFC DK 001-3, section 7.1.8: “On the areas not intensively managed, the use of pesticides (including rodenticides) shall be minimized. Appropriate silvicultural alternatives and other biological measures are to be preferred to the use of chemical pesticides (including rodenticides).”</p>
5.2.9 The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available.	YES	<p>PEFC DK 001-3, sections 7.1.6 and 7.1.8:</p> <p>“<input type="checkbox"/> The use of pesticides listed as WHO Type 1A and 1B pesticides, chlorinated hydrocarbons and other very toxic pesticides, whose derivatives remain biologically active beyond their intended use, and other pesticides banned by international agreement, are prohibited.”</p>
5.2.10 Pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.	YES	<p>PEFC DK 001-3, sections 7.1.6 and 7.1.8:</p> <p>“<input type="checkbox"/> The use of pesticides listed as WHO Type 1A and 1B pesticides, chlorinated hydrocarbons and other very toxic pesticides, whose derivatives remain biologically active beyond their intended use, and other pesticides banned by international agreement, are prohibited.”</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>PEFC DK 001-3, section 7.3.7:</p> <p>“The use of pesticides, including rodenticides, shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.”</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>PEFC DK 001-3, section 7.1.6: “The intensively managed areas must be developed in a nature and environmentally friendly way, so that:</p> <p><input type="checkbox"/> The use of pesticides and fertilizer is minimal and environmentally responsible.”</p> <p>PEFC DK 001-3, section 7.1.7: “On the areas not intensively managed the use of fertilizers must be out-phased through adjustment of the cultivation systems so that:</p> <p><input type="checkbox"/> The use of fertilizers outside the intensively managed areas does not occur, where special nature elements depend on the area being in an oligotrophic state.</p>

Question	YES / NO*	Reference to scheme documentation
		<input type="checkbox"/> Fertilizers may only be applied in relation to establishment of a culture on oligotrophic locations, where conifers are to be converted into broad leaf areas and where it is critical for the establishment. The contribution of nutrients from the surrounding atmosphere shall be included as a factor for the decision making. <input type="checkbox"/> The cultivation system is adjusted so that fertilizer (or recycling of ash) does not have to be used. Exemption from this must be covered by a statement from an expert."
Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)		
5.3.1 Forest management planning shall aim to maintain the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis.	YES	PEFC DK 001-3, section 7.1.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area."
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	PEFC DK 001-3, section 6: "Overall the criteria form the basis for long term sustainable management of PEFC certified forests, where a balance between concerns for the stability of the forest, production of wood and other goods, economic viability, environmental protection, biological diversity, landscape and cultural history and social considerations, is secured." PEFC DK 001-3, section 7.1.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area." PEFC DK 001-3, section 7.1.4: "The rate of harvest – both wood and non-wood forest products – must happen in a way that does not affect the long term productivity capacity of the site. For the production of wood, this is secured through compliance with the other requirements stipulated in this standard. If non-wood products from the forest are to be utilized commercially, the owner shall establish guidelines for the management to secure it does not affect the long term production capacity of the site."
5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.	YES	PEFC DK 001-3, section 7.1.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area. Further forest management shall be structured to minimise the risk of degradation of and damages to forest ecosystems. I 1.1.1. Evaluation of the owner's policy and objective. I 1.1.2. Planning as described in section 7.4 is implemented" PEFC DK 001-3, section 7.4: "A system for forest management planning for the forest property shall be

Question	YES / NO*	Reference to scheme documentation
		<p>established and maintained as described in the following. The section is divided into the following sub-sections:</p> <ul style="list-style-type: none"> - Management objectives - Preliminary registrations - Continuous registrations - Sale of certified wood - Chain of Custody (only for a partly-certified forest property)." <p>PEFC DK 001-3, section 7.4.2: "Preliminary registrations: A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period. The written documentation for the forest property shall be available for the certification body conducting the audit. The documentation can be either an IT based management system, an existing management plan, a green management plan or similar. The written documentation shall include the following:</p> <ul style="list-style-type: none"> a) Objectives for the forest management. b) The written procedures for controlling all documents and registrations required by this standard to ensure that: <ul style="list-style-type: none"> • They can be located; • They are periodically reviewed, revised as necessary and approved for adequacy by authorized personnel; • The current version of relevant documents is available at all locations where operations essential to the effective functioning of the management system are performed; • Obsolete documents are promptly removed from all points of issue and points of use or otherwise assured against unintended use. <p>Procedures and responsibility shall be established and maintained concerning the creation and modification of the various types of documents.</p> <ul style="list-style-type: none"> c) A written procedure for the forest owner's yearly evaluation of the forest management relating to the defined policy and objectives, including descriptions of recorded deviations in relation to the standard. d) Forest maps showing certified areas. Requirements for the forest map: <ul style="list-style-type: none"> • The delineation of the certified area shall be identified on the map. • The map shall be produced in a scale of 1:4000-1:10000. • The map should include the inner delineation of the forest into forest types or stands (including areas with special natural values), the roads and passages. The individual compartments is to be numbered e.g. after the compartment/ sub-compartment system. • Each compartment is to be described at least with the following data:

Question	YES / NO*	Reference to scheme documentation
		<ul style="list-style-type: none"> o Size o Main species o Extent of important mixed species – description and percentage composition of species if stand is mixed o Age or year of establishment (may be based on professional judgement) o Land use of areas without tree cover <p>There are no further requirements to the form of the map. E.g. there is no requirement of digitizing the map. The forest map can be in the form of a handmade drawing on a true aerial photography.</p> <ul style="list-style-type: none"> e) Determination of the annual allowable cut in the planning period, including justification f) Registrations relating to map of: <ul style="list-style-type: none"> • Designated biodiversity areas, including untouched forest. • Registered conservation areas as well as § 3 protection areas of the Nature Protection Act and Natura 2000 habitats registered by the authorities. • Other natural values. E.g. areas with a high biodiversity or with rare plants and/or animals, untouched forest, areas with old management practises, § 3 areas not registered by the authorities and areas of a significant size protected by § 28 in accordance to the Forest Act. Can be a 'registration of key woodland habitats, an assessment of natural values' or the owners own registration of the natural values at the property. • Areas with drinking water interests designated by the municipality. • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant. • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation (can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.). • Areas allocated to intensive management practice. g) A maintenance plan for the biodiversity areas containing at least: <ul style="list-style-type: none"> • The objective with the designated area • The time horizon • Elements of concern for protection • Necessary actions for maintenance h) Guidelines for use of non-wood products from the forest, if relevant cf. criterion 1.3. <p>PEFC DK 001-3, section 7.4: "Available knowledge and data from research institutions, forest monitoring and counseling services, as appropriate, shall be used in the planning process and the grant schemes aimed at forestry that promotes forest policies shall be considered."</p>

Question	YES / NO*	Reference to scheme documentation
5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.	YES	PEFC DK 001-3, section 7.1.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area."
5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.	YES	<p>PEFC DK 001-3, section 7.1.2: "The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retaining sufficient stocking density on the property's forest covered area. <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. <p>Clear cuts shall not be used where a biologically rich nature is characterised by continuity in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting. Restocking must take place within 3 growth seasons. <p>This does not prevent establishment and management of open nature areas, areas with coppiced forests, silvopasture and intensive land management and other unconventional woodland practises as long as it come within the scope of the forest act and its exemption possibilities."</p> <p>PEFC DK 001-3, section 7.1.4: "The rate of harvest – both wood and non-wood forest products – must happen in a way that does not affect the long term productivity capacity of the site. For the production of wood, this is secured through compliance with the other requirements stipulated in this standard. If non-wood products from the forest are to be utilized commercially, the owner shall establish guidelines for the management to secure it does not affect the long term production capacity of the site."</p> <p>PEFC DK 001-3, section 7.2.10: "Logging, transport and</p>

Question	YES / NO*	Reference to scheme documentation
		regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations.”
5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.	YES	<p>PEFC DK 001-3, section 7.1.4: “The rate of harvest – both wood and non-wood forest products – must happen in a way that does not affect the long term productivity capacity of the site. For the production of wood, this is secured through compliance with the other requirements stipulated in this standard. If non-wood products from the forest are to be utilized commercially, the owner shall establish guidelines for the management to secure it does not affect the long term production capacity of the site.”</p> <p>PEFC DK 001-3, section 7.1.7: “On the areas not intensively managed the use of fertilizers must be out-phased through adjustment of the cultivation systems so that:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The use of fertilizers outside the intensively managed areas does not occur, where special nature elements depend on the area being in an oligotrophic state. <input type="checkbox"/> Fertilizers may only be applied in relation to establishment of a culture on oligotrophic locations, where conifers are to be converted into broad leaf areas and where it is critical for the establishment. The contribution of nutrients from the surrounding atmosphere shall be included as a factor for the decision making. <input type="checkbox"/> The cultivation system is adjusted so that fertilizer (or recycling of ash) does not have to be used. Exemption from this must be covered by a statement from an expert.”
5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.	YES	<p>PEFC DK 001-3, section 7.1.3: “The rate of harvest – both wood and non-wood forest products – must happen in a way that does not affect the long term productivity capacity of the site. For the production of wood, this is secured through compliance with the other requirements stipulated in this standard. If non-wood products from the forest are to be utilized commercially, the owner shall establish guidelines for the management to secure it does not affect the long term production capacity of the site.”</p> <p>PEFC DK 001-3, section 7.3.6: “The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work. The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.</p> <p>PEFC DK 001-3, section 7.3.9: “Other contractors and users of the forest, e.g. hunters, firewood collectors, organizers of recreational activities etc., shall have specific information about protections and designations if it</p>

Question	YES / NO*	Reference to scheme documentation
		<p>is assessed that the different values are possibly to be affected by the activity. E.g. a wood collector cutting wood in a middle aged stand must be able to demonstrate knowledge relevant for the stand in concern, so as protection of a historic relic or valuable nature.”</p> <p>PEFC DK 001-3, section 7.4.2: “The written documentation shall include the following: h) Guidelines for use of non-wood products from the forest, if relevant cf. criterion 1.3.”</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>PEFC DK 001-3, section 7.3.1: “Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations.”</p> <p>PEFC DK 001-3, section 7.3.1: “Opportunities for outdoor recreation and nature experience in the forest shall be ensured by i.a. easy access, including the maintenance and establishment of roads and pathways, clearing of scenic views and possibly designation of sites of particular recreational value.”</p>
<p>Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems</p>		
<p>5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.2.1: “The structure in the forest shall be developed in a way that it contains different tree species at different ages, to create a variation in habitats and a stable and robust forest. Other tree and bush species than the main species must be promoted under cleaning and thinning operations, where this is economically justifiable and where these with advantage can become part of the stand structure.”</p> <p>PEFC DK 001-3, section 7.2.4: “A minimum of 7.5 % of the total certified area of the property shall be designated as biodiversity area, including untouched forest. Biodiversity areas must primarily be laid out where:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The conservation of unique biological values requires that the area is left untouched or maintained if this is necessary to preserve or promote the natural values. <input type="checkbox"/> Where biodiversity areas, including untouched forest, supports networks (e.g. corridors) in the landscape. <input type="checkbox"/> Where it is to be considered feasible based on an overall ecological, economic and social assessment.” <p>PEFC DK 001-3, section 7.2.7: “Rare indigenous species, including red listed species, shall be protected or promoted and are not allowed to be used commercially.”</p> <p>PEFC DK 001-3, section 7.4: “A system for forest management planning for the forest property shall be established and maintained as described in the following. The section is divided into the following sub-sections:</p>

Question	YES / NO*	Reference to scheme documentation
		<ul style="list-style-type: none"> - Management objectives - Preliminary registrations - Continuous registrations - Sale of certified wood - Chain of Custody (only for a partly-certified forest property)” <p>PEFC DK 001-3, section 7.4.1: “The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard.</p> <p>The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management” <p>Since forest management planning objectives shall take into consideration the requirements of the standard this will sufficiently cover the aim to maintain, conserve and enhance biodiversity</p>
<p>5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:</p> <p>a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;</p> <p>b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;</p> <p>c) endangered or protected genetic <i>in situ</i> resources;</p> <p>and taking into account</p> <p>d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.</p>	YES	<p>PEFC DK 001-3, section 7.4.1: “The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard.</p> <p>The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management” <p>PEFC DK 001-3, section 7.4.2: “f) Registrations relating to map of:</p> <ul style="list-style-type: none"> • Designated biodiversity areas, including untouched forest. • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. • Other natural values. E.g. areas with a high biodiversity or with rare plants and/or animals, untouched forest, areas with old management practises, § 3 areas not registered by the authorities and areas of a significant size protected by § 28 in accordance to the Forest Act. Can be a ‘registration of key woodland habitats, an assessment of natural values’ or the owners own registration of the natural values at the property. • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant. • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation (can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.). • Areas allocated to intensive management practice. <p>g) A maintenance plan for the biodiversity areas containing at least:</p> <ul style="list-style-type: none"> • The objective with the designated area • The time horizon • Elements of concern for protection • Necessary actions for maintenance” <p>Through the inclusion of the specific requirements 7.2.2-7.2.9 in objectives and policies for management planning as</p>

Question	YES / NO*	Reference to scheme documentation
		defined under 7.4.1 and specifications under 7.4.2 for biodiversity management the standard conforms to this PEOLG.
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.	YES	PEFC DK 001-3, section 7.2.2: "Rare indigenous species, including red listed species, shall be protected or promoted and are not allowed to be used commercially."
5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.	YES	<p>PEFC DK 001-3, section 7.1.2: "The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retaining sufficient stocking density on the property's forest covered area. <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. <p>Clear cuts shall not be used where a biologically rich nature is characterised by continuity in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting. Restocking must take place within 3 growth seasons."
5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.	YES	<p>PEFC DK 001-3, section 7.1.10: "Use of native species shall be promoted in a way that the forested area of the property ultimately will consist of at least 20 % and 55 % of native species, respectively at poor and better soils. The percentages are determined based on the recorded mixture ratios of the species."</p> <p>PEFC DK 001-3, section 7.1.11: "Exotic species may only be used where they do not threaten significant natural values and are locally adapted."</p> <p>PEFC DK 001-3, section 7.2.13: "Invasive species shall be controlled where it is economically and practically possible</p>

Question	YES / NO*	Reference to scheme documentation
		and especially at the areas designated as biodiversity areas, hereunder untouched forest. The forest owner shall be familiar with the "black list" and introduction of species on this list is not allowed."
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	PEFC DK 001-3, section 7.1.2: "The long term, stable forest climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways: <input type="checkbox"/> Retaining sufficient stocking density on the property's forest covered area. <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. Clear cuts shall not be used where a biologically rich nature is characterised by continuity in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable. <input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting. Restocking must take place within 3 growth seasons."
5.4.7 Genetically-modified trees shall not be used.	YES	PEFC DK 001-3, section 7.1.12: "Use of genetically modified plants is prohibited. Clones are not allowed as the main tree species at more than 5 % of the forested area."
5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.	YES	PEFC DK 001-3, section 7.1.10: "Use of native species shall be promoted in a way that the forested area of the property ultimately will consist of at least 20 % and 55 % of native species, respectively at poor and better soils. The percentages are determined based on the recorded mixture ratios of the species." PEFC DK 001-3, section 7.2.1: "The structure in the forest shall be developed in a way that it contains different tree species at different ages, to create a variation in habitats and a stable and robust forest. Other tree and bush species than the main species must be promoted under cleaning and thinning operations, where this is economically justifiable and where these with advantage can become part of the stand structure."

Question	YES / NO*	Reference to scheme documentation
		PEFC DK 001-3, section 7.2.9: "Lakes, ponds, streams, bogs, heath lands, coastal meadows or marshes, water meadows and commons associated with the forest, where the hydrology has been altered through draining or other interventions, shall to the extent possible be re-established to their original state, taking into consideration the economic consequences, hereunder the stability of the neighboring stands. An increase of the area of these nature types should take place in each 5 year period, if there is a potential for this. Drainage of areas not previously drained is not allowed."
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	YES	PEFC DK 001-3, section 7.2.2: "Coppicing and other old forest management systems of particular cultural, historical, biological value, or value for the landscape, shall be preserved in a way that the mentioned values are maintained or promoted. Older types of woodland operations include coppiced forests, grazing forests, cut or grazed forest meadow, protected oak thickets or selective felling."
5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to improve or maintain biological diversity.	YES	<p>PEFC DK 001-3, section 7.2.10: "Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations."</p> <p>PEFC DK 001-3, section 7.2.1: "The structure in the forest shall be developed in a way that it contains different tree species at different ages, to create a variation in habitats and a stable and robust forest. Other tree and bush species than the main species must be promoted under cleaning and thinning operations, where this is economically justifiable and where these with advantage can become part of the stand structure."</p> <p>PEFC DK 001-3, section 7.2.3: "The silviculture shall contribute to a continuous recruitment of big, old trees and dead wood in the forest to accommodate the biological diversity."</p> <p>PEFC DK 001-3, section 7.2.5: "Stable forest fringes with a high proportion of native tree and bush species shall be maintained and developed."</p> <p>PEFC DK 001-3, section 7.2.6: "Characteristic old trees shall be retained. Under planning and operations in the stands these trees must be ensured sufficiently influx of light."</p> <p>PEFC DK 001-3, section 7.2.8: "Activities impacting negatively on particularly vulnerable areas and species should be regulated."</p>
5.4.11 Infrastructure shall be planned and constructed in a way that	YES	PEFC DK 001-3, section 7.2.10: "Logging, transport and regeneration techniques which spare/protect the site and the

Question	YES / NO*	Reference to scheme documentation
<p>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>stand shall be applied to ensure favorable soil conditions and to avoid damage to rare, sensitive or representative ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations.”</p> <p>PEFC DK 001-3, section 7.2.8: “Activities impacting negatively on particularly vulnerable areas and species shall be regulated.”</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>	YES	<p>PEFC DK 001-3, section 7.2.16: “Fencing in the forest shall be used in a way that does not block or hinder the passage of wildlife. After use the fences shall be taken down.”</p> <p>PEFC DK 001-3, section 7.2.17: “Wildlife management shall comply with the principles of multiple management use. This also applies to selection of locally adapted tree species and the possibilities for natural regeneration.”</p> <p>PEFC DK 001-3, section 7.2.18: “Feeding crops shall be grown where specific wildlife management reasons support it. Feeding crops must not be located at areas with protected nature types.”</p>
<p>5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.</p>	YES	<p>PEFC DK 001-3, section 7.2.1: “The structure in the forest shall be developed in a way that it contains different tree species at different ages, to create a variation in habitats and a stable and robust forest. Other tree and bush species than the main species must be promoted under cleaning and thinning operations, where this is economically justifiable and where these with advantage can become part of the stand structure.”</p> <p>PEFC DK 001-3, section 7.2.3: “The silviculture shall contribute to a continuous recruitment of big, old trees and dead wood in the forest to accommodate the biological diversity. When regeneration cuttings are carried out, at least 5 trees or approximately 10 m³ wood on the stump per ha shall be retained in the production forest for natural decay and death and decay (nesting trees, hollow trees and dead wood). The selection of these trees must be made in a way that these eternity trees are chosen from long term, stable species and typically from the group of standards. The eternity trees may be clustered in one or more groups in the stand. The eternity trees may be replaced by 5 snags if appropriate stable individuals are not present. In middle aged and older stands, at least 3 snags (as high as possible) or at least 3 lying trees in total per ha shall be retained. Beside of that, existing veteran trees and lying trees undergoing a natural decay shall be retained and protected.”</p> <p>PEFC DK 001-3, section 7.2.4: “Where there at the time of certification exist areas with untouched forest or biologically particular valuable forest with very</p>

Question	YES / NO*	Reference to scheme documentation
		<p>long continuity, these areas shall be preserved and designated and form part of the 7.5 %. Units that once have been designated as untouched forest cannot be replaced by another management system.”</p> <p>PEFC DK 001-3, section 7.2.4: “Rare indigenous species, including red listed species, shall be protected or promoted and are not allowed to be used commercially.”</p>
Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)		
<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>PEFC DK 001-3, section 7.4.1: “The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard. The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management” <p>PEFC DK 001-3, section 7.4.2: “f) Registrations relating to map of:</p> <ul style="list-style-type: none"> • Designated biodiversity areas, including untouched forest. • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. • Other natural values. E.g. areas with a high biodiversity or with rare plants and/or animals, untouched forest, areas with old management practises, § 3 areas not registered by the authorities and areas of a significant size protected by § 28 in accordance to the Forest Act. Can be a 'registration of key woodland habitats, an assessment of natural values' or the owners own registration of the natural values at the property. • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant. • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation (can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.). • Areas allocated to intensive management practice. <p>g) A maintenance plan for the biodiversity areas containing at least:</p> <ul style="list-style-type: none"> • The objective with the designated area • The time horizon • Elements of concern for protection • Necessary actions for maintenance” <p>Through the inclusion of the specific requirements 7.1.9 and 7.2.8-7.2.10 in objectives and policies for management planning as defined under 7.4.1 and specifications under 7.4.2 for biodiversity management the standard conforms to this PEOLG.</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</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.4.1: “The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard. The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property

Question	YES / NO*	Reference to scheme documentation
these areas into account.		<p>• All essential intermediate objectives and policies for the forest management”</p> <p>PEFC DK 001-3, section 7.4.2: “f) Registrations relating to map of:</p> <ul style="list-style-type: none"> • Designated biodiversity areas, including untouched forest. • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. • Other natural values. E.g. areas with a high biodiversity or with rare plants and/or animals, untouched forest, areas with old management practises, § 3 areas not registered by the authorities and areas of a significant size protected by § 28 in accordance to the Forest Act. Can be a 'registration of key woodland habitats, an assessment of natural values' or the owners own registration of the natural values at the property. • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant. • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation (can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.). • Areas allocated to intensive management practice. <p>g) A maintenance plan for the biodiversity areas containing at least:</p> <ul style="list-style-type: none"> • The objective with the designated area • The time horizon • Elements of concern for protection • Necessary actions for maintenance”
5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.	YES	<p>PEFC DK 001-3, section 7.1.9: “Soil scarification on areas not intensively managed must be limited with respect to the effect on fungi, flora and fauna, so that:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Shallow soil scarification may be carried out on maximum 70 % of the area for regeneration, where this is necessary for ensuring the regeneration or a change in tree species. It is done in a way that secure untreated areas around seed trees, along forest fringes, on wet areas and other biological valuable habitats. <input type="checkbox"/> Deep soil preparation may only be carried out sporadically or in rows. <input type="checkbox"/> Sporadic and line treatments may only be carried out with an intensity that normal plant spacing would require. <input type="checkbox"/> Removal of stumps and deep grounded ploughing is not allowed. <input type="checkbox"/> A reason for the choice of method shall be possible to present. <p>PEFC DK 001-3, section 7.2.10: “Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations.”</p> <p>PEFC DK 001-3, section 7.2.8: “Activities impacting negatively on particularly vulnerable areas and species</p>

Question	YES / NO*	Reference to scheme documentation
		<p>should be regulated.”</p> <p>PEFC DK 001-3, section 7.2.16: “Fencing in the forest shall be used in a way that does not block or hinder the passage of wildlife. After use the fences shall be taken down.”</p> <p>PEFC DK 001-3, section 7.2.18: “Feeding crops shall be grown where specific wildlife management reasons support it. Feeding crops must not be located at areas with protected nature types.”</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 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>YES</p>	<p>PEFC DK 001-3, section 7.2.10: “Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions and to avoid damage to rare, sensitive or representative ecosystems and genetic reserves. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations.”</p> <p>PEFC DK 001-3, section 7.2.11: “At construction of forest roads, crossings and other infrastructure in the forest it shall be ensured that the water environment is not negatively affected and that the natural level and the natural functions of streams are preserved. Furthermore, it shall be ensured that soil exposure is minimized. Proper drainage of newly built roads shall be installed and maintained.</p> <p>I 2.11.1. The natural level and the natural functions of streams are preserved at construction of forest roads, crossings and other infrastructure in the forest</p> <p>I 2.11.2. Proper drainage of newly built roads are installed.”</p> <p>PEFC DK 001-3, section 7.2.12: “The spillage of oil and other substances harmful to the environment, through forest management operations or the indiscriminate disposal of waste on forestland, shall be strictly avoided.”</p> <p>PEFC DK 001-3, section 7.4.2: f) Registrations relating to map of: - - Areas with drinking water interests designated by the municipality.</p> <p>The combination of the cited criteria ensures a system in which forest areas with water protection functions are identified, addressed in management planning and given special care in forest operations.</p>
<p>5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.2.11: “At construction of forest roads, crossings and other infrastructure in the forest it shall be ensured that the water environment is not negatively affected and that the natural level and the natural functions of streams are preserved. Furthermore, it shall be ensured that soil exposure is minimized. Proper drainage of newly built roads shall be installed and maintained.</p> <p>I 2.11.1. The natural level and the natural functions of streams are preserved at construction of forest roads, crossings and other infrastructure in the forest</p> <p>I 2.11.2. Proper drainage of newly built roads are installed.”</p>

Question	YES / NO*	Reference to scheme documentation
Criterion 6: Maintenance of other socio-economic functions and conditions		
<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>	YES	<p>PEFC DK 001-3, section 7.4: "Due regard to the role of forestry in rural development shall be given in the planning process, and especially new opportunities for employment in connection with the socio-economic functions of forests shall be considered taking into account the size of the forest."</p> <p>PEFC DK 001-3, section 7.4.1: "The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard. The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management" <p>PEFC DK 001-3, section 7.4.2: "f) Registrations relating to map of:</p> <ul style="list-style-type: none"> • Designated biodiversity areas, including untouched forest. • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. • Other natural values. E.g. areas with a high biodiversity or with rare plants and/or animals, untouched forest, areas with old management practises, § 3 areas not registered by the authorities and areas of a significant size protected by § 28 in accordance to the Forest Act. Can be a 'registration of key woodland habitats, an assessment of natural values' or the owners own registration of the natural values at the property. • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant. • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation (can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.). • Areas allocated to intensive management practice. <p>g) A maintenance plan for the biodiversity areas containing at least:</p> <ul style="list-style-type: none"> • The objective with the designated area • The time horizon • Elements of concern for protection • Necessary actions for maintenance" <p>PEFC DK 001-3, section 7.1.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area."</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>	YES	<p>PEFC DK 001-3, section 7.3.1: "Opportunities for outdoor recreation and nature experience in the forest shall be ensured by i.a. easy access, including the maintenance and establishment of roads and pathways, clearing of scenic views and possibly designation of sites of particular recreational value."</p> <p>PEFC DK 001-3, section 7.3.1: "Information about possibilities of access and recreation in the forest shall be</p>

Question	YES / NO*	Reference to scheme documentation
		<p>easily accessible for the public.”</p> <p>PEFC DK 001-3, section 7.3.3: “The forest owner and his employees shall be ready to enter into a dialogue with users and the local community aiming i.e. at ensuring a reasonable:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Planning and exerting of recreation in the forest. <input type="checkbox"/> Utilization of knowledge about the natural and cultural history of the forest.” <p>PEFC DK 001-3, section 7.3.6: “The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work. The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.”</p> <p>PEFC DK 001-3, section 7.3.7: “The use of pesticides, including rodenticides, shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.”</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>PEFC DK 001-3, section 5: “The forest owner is through the agreement obliged to accept and comply with the following obligations:</p> <ol style="list-style-type: none"> 1) PEFC Denmark’s Forest Management Standard 2) Relevant legislation and regulation regulating forest management in Denmark. <p>The forest owner shall be able to document the ownership of all areas included in the certificate. If this is a matter of dispute, the ownership can be documented through the governmental database OIS or through a land certificate from the Land Registry.”</p> <p>PEFC DK 001-3, section 7.4.2: “f) Registrations relating to map of:</p> <ul style="list-style-type: none"> • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities.”
<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</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.3.11: “All the [ILO] conventions have been ratified in Denmark. Beside of these:</p> <ul style="list-style-type: none"> <input type="checkbox"/> No. 169: Indigenous and Tribal Peoples Convention, 1989”

Question	YES / NO*	Reference to scheme documentation
<p>the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>		
<p>5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.</p>	YES	<p>PEFC DK 001-3, section 7.3.1: "Opportunities for outdoor recreation and nature experience in the forest shall be ensured by i.a. easy access, including the maintenance and establishment of roads and pathways, clearing of scenic views and possibly designation of sites of particular recreational value taking in to account the size of the forest. The planning for outdoor recreation shall be done with respect for ownership rights."</p> <p>PEFC DK 001-3, section 7.3.2: "Information about possibilities of access and recreation in the forest shall be easily accessible for the public."</p> <p>PEFC DK 001-3, section 7.2.7: "Rare indigenous species, including red listed species, shall be protected or promoted and are not allowed to be used commercially. I 2.7.1. Registrations of natural values are in place and are considered through the management."</p> <p>PEFC DK 001-3, section 7.2.8: "Activities impacting negatively on particularly vulnerable areas and species should be regulated. I 2.8.1. Registrations of natural values are in place and are considered through the regulation of straining activities."</p> <p>PEFC DK 001-3, section 7.3.2: "Information about possibilities of access and recreation in the forest shall be easily accessible for the public."</p> <p>No reference was found that addresses public access in relation with the respect for ownership rights and the rights of others.</p>
<p>5.6.6 Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.</p>	YES	<p>PEFC DK 001-3, section 7.3.3: "The forest owner and his employees shall be ready to enter into a dialogue with users and the local community aiming i.e. at ensuring a reasonable: <input type="checkbox"/> Planning and exerting of recreation in the forest. <input type="checkbox"/> Utilization of knowledge about the natural and cultural history of the forest."</p> <p>PEFC DK 001-3, section 7.3.4: "Due regard in management shall be paid to historic and cultural heritage sites and the forest management shall ensure that these sites are preserved."</p>

Question	YES / NO*	Reference to scheme documentation
		PEFC DK 001-3, section 7.3.5: "Particular landscape features and functions of the forest e.g. characteristic trees and scenic views shall continuously be maintained and improved."
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	<p>PEFC DK 001-3, section 7.1.1: "The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area."</p> <p>PEFC DK 001-3, section 7.2.1: "The structure in the forest shall be developed in a way that it contains different tree species at different ages, to create a variation in habitats and a stable and robust forest. Other tree and bush species than the main species must be promoted under cleaning and thinning operations, where this is economically justifiable and where these with advantage can become part of the stand structure."</p> <p>PEFC DK 001-3, section 7.2.2: "Coppicing and other old forest management systems of particular cultural, historical, biological value, or value for the landscape, shall be preserved in a way that the mentioned values are maintained or promoted. Older types of woodland operations include coppiced forests, grazing forests, cut or grazed forest meadow, protected oak thickets or selective felling."</p> <p>PEFC DK 001-3, section 7.3.1: "Opportunities for outdoor recreation and nature experience in the forest shall be ensured by i.a. easy access, including the maintenance and establishment of roads and pathways, clearing of scenic views and possibly designation of sites of particular recreational value."</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.	YES	<p>PEFC DK 001-3, section 7.3.6: "The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees have the necessary skills to carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work. The forest owner shall continuously ensure that employees get the necessary supplementary training to carry out a sustainable management."</p> <p>PEFC DK 001-3, section 7.3.8: "The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. Further the employees and specialized machine operators must have access to the written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task."</p>

Question	YES / NO*	Reference to scheme documentation
		<p>The owner shall in connection to this ensure that the specialized machine operator possess the competences listed in annex 2 as a minimum.”</p> <p>PEFC DK 001-3, section 7.3.9: “Other contractors and users of the forest, e.g. hunters, firewood collectors, organizers of recreational activities etc., shall have specific information about protections and designations if it is assessed that the different values are possibly to be affected by the activity.”</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>PEFC DK 001-3, section 7.3.3: “The forest owner and his employees shall be ready to enter into a dialogue with users and the local community aiming i.e. at ensuring a reasonable:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Planning and exerting of recreation in the forest. <input type="checkbox"/> Utilization of knowledge about the natural and cultural history of the forest.”
<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>NO</p>	<p>PEFC DK 001-3, section 7.3.3: “The forest owner and his employees shall be ready to enter into a dialogue with users and the local community aiming i.e. at ensuring a reasonable:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Planning and exerting of recreation in the forest. <input type="checkbox"/> Utilization of knowledge about the natural and cultural history of the forest.” <p>No requirement was found for mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.</p> <p>PEFC DK states that: “Due to § 62 in the Forest Act anyone with a significant interest in a case is entitled to complain to the Natural and Environmental Appeal Board. The Natural and Environmental Appeal Board is an independent complaints authority for administrative decisions within the plan, nature and the environment areas.</p> <p>§§ 60 – 64 in the Forest Act gives the more detailed rules for handling complaints.</p> <p>While the same possibilities for complaints are given in the Nature Protection Act (§§ 78-87).</p> <p>The possibility for complaining within the plan, nature and the environment areas is often used and decisions of the Board are used in the administration of laws.”</p> <p>Although these legal possibilities for appeal may play a role in some cases, it is in the spirit of this requirement that complaints and disputes are solved as much as possible at the level where they occur, i.e. between manager and local people. Including a government authority is a possible next step.</p> <p>A mechanism ‘above’ the forest management level is acceptable in case it can functionally serve the purpose of effective communication and consultation with local people and other stakeholders relating to sustainable forest management and for resolving complaints and disputes relating to forest management between forest operators and</p>

Question	YES / NO*	Reference to scheme documentation
		<p>local people.</p> <p>The mechanism cited by PEFC Denmark can only serve partly to cover the requirement, because the mechanism relates to appeals regarding administrative decisions taken by the government and issues under the jurisdiction of the government. Any other issues, including private to private complaints, are not covered under the scope of the cited mechanism. Also, there is a missing link in the chain of events before arriving at an appeal. Appeals are made against formal decisions, whereas a complaint or dispute does not need to be a reaction to a formal decision. The missing link is the complaint and dispute resolution mechanism relating to forest management between forest operators and local people.</p>
<p>5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.</p>	<p>YES</p>	<p>PEFC DK 001-3, section 7.3.6: "The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees have the necessary skills to carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work."</p> <p>PEFC DK 001-3, section 7.3.8: "The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. Further the employees and specialized machine operators must have access to the written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task. The owner shall in connection to this ensure that the specialized machine operator possess the competences listed in annex 2 as a minimum."</p> <p>PEFC DK cites Danish legislation to further cover this requirement: "Denmark's Working Environment Act is very comprehensive and makes great demands on employers in relation to comply with safety and ensure healthy and safe working conditions.</p> <p>By § 1 states: § 1 The Act seeks to create 1) a safe and healthy working environment at all times in accordance with the technical and social development in the community and 2) the basis for the companies themselves can resolve safety and health issues with guidance from social organizations and the guidance and control of workplace exposure. (google translate)</p> <p>The law includes work for an employer see § 2 and in many cases, also when private performing work in their spare time at home (§)</p> <p>Furthermore, there is a wide range of industry guidance for</p>

Question	YES / NO*	Reference to scheme documentation
		agriculture published by BAR jordtilbord "
5.6.12 Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.	YES	<p>PEFC DK 001-3, section 7.3.6: "The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees have the necessary skills to carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work."</p> <p>PEFC DK 001-3, section 7.3.7: "The use of pesticides, including rodenticides, shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training."</p> <p>PEFC DK 001-3, section 7.3.8: "The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. Further the employees and specialized machine operators must have access to the written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task. The owner shall in connection to this ensure that the specialized machine operator possess the competences listed in annex 2 as a minimum."</p>
5.6.13 Forest management shall comply with fundamental ILO conventions.	YES	<p>PEFC DK 001-3, section 7.3.11: "All collective agreements shall be respected for all employees, this counts for permanent staff, hourly-paid workers, temporary workers, seasonal worker etc.. The forest management shall be carried out in respect of the ILO Conventions on workers' rights, safety and health. ILO's core conventions:</p> <ul style="list-style-type: none"> <input type="checkbox"/> No. 29: Forced Labour, 1930 <input type="checkbox"/> No. 87: Freedom of Associations and Protection of the Right to Organise, 1948 <input type="checkbox"/> No. 98: Right to Organise and Collective Bargaining, 1949 <input type="checkbox"/> No. 100: Equal Remuneration. 1951 <input type="checkbox"/> No. 105: Abolition of Forced Labour, 1957 <input type="checkbox"/> No. 111: Discrimination (Employment and Occupation), 1958 <input type="checkbox"/> No. 138: Minimum Age for Admission to Employment, 1973 <input type="checkbox"/> No. 182: Worst Forms of Child Labour, 1999 <p>All the conventions have been ratified in Denmark. Beside of these:</p> <ul style="list-style-type: none"> <input type="checkbox"/> No. 169: Indigenous and Tribal Peoples Convention, 1989 <input type="checkbox"/> No. 184: Safety and health in agriculture (covers also forestry) <input type="checkbox"/> ILO Code of Good Practice: Safety and Health in Forestry Work <p>I 3.11.1. All collective agreements have been respected in regard to all employees.</p> <p>I 3.11.2. The forest management is carried out in respect for ILO core conventions 29,</p>

Question	YES / NO*	Reference to scheme documentation
		87, 98, 100, 105, 111, 138, 182, 169, 184 and ILO Code of Good Practice: Safety and Health in Forestry Work.”
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.	YES	PEFC DK 001-3, section 7.3.10: “The forest owner shall at a reasonable degree be willing to host areas and offer knowledge to research activities and data collection when approached by research institutions.” PEFC DK 001-3, section 7.4: “Available knowledge and data from research institutions, forest monitoring and counseling services, as appropriate, shall be used in the planning process and the grant schemes aimed at forestry that promotes forest policies shall be considered.”
Criterion 7: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)		
5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.	YES	The forest owner is through the agreement obliged to accept and comply with the following obligations: 1) PEFC Denmark’s Forest Management Standard 2) Relevant legislation and regulation regulating forest management in Denmark. A minimum list of relevant legislation can be seen in annex 1. The forest owner shall be able to document the ownership of all areas included in the certificate. If this is a matter of dispute, the ownership can be documented through the governmental database OIS or through a land certificate from the Land Registry.” Annex 1 lists 22 relevant laws that have to be complied with.
5.7.2 Forest management shall provide for adequate protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	The forest owner is through the agreement obliged to accept and comply with the following obligations: 1) PEFC Denmark’s Forest Management Standard 2) Relevant legislation and regulation regulating forest management in Denmark. A minimum list of relevant legislation can be seen in annex 1. The forest owner shall be able to document the ownership of all areas included in the certificate. If this is a matter of dispute, the ownership can be documented through the governmental database OIS or through a land certificate from the Land Registry.”

* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

PART IV: MINIMUM REQUIREMENTS CHECKLIST FOR CERTIFICATION AND ACCREDITATION PROCEDURES (ANNEX 6)

3 SCOPE

This document covers requirements for certification and accreditation procedures given in Annex 6 to the PEFC Council Technical Document (*Certification and accreditation procedures*).

4 CHECKLIST

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
Certification Bodies				
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that 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>The Danish Scheme chapter 7.2: "PEFC is based on independent accreditation of certification organizations. Therefore it is an explicit requirement that all certification audits carried out under the Danish scheme must be carried out by third-party independent and PEFC notified certification bodies accredited by DANAK or other national European-based accreditation bodies which are members of the European Cooperation for Accreditation (EA) and/or the International Accreditation Forum (IAF) and have signed the agreement of mutual recognition."</p>
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>PEFC D 005-3 chapter 5.1: "The auditors must: 1. Fulfil the general criteria, as appropriate, for environmental auditors defined in DS/EN ISO/IEC 17021:2011: Conformity assessment - Requirements for bodies providing audit and certification of management systems, (...)"</p> <p>PEFC DK 005-3 chapter 6.3: "The qualification criteria for the certification bodies used in certification audits of sustainable forest management and group certification of sustainable forest management, are based on the "Requirements for bodies providing audit and certification of management systems" (DS/EN ISO/IEC 17021:2011), supplemented with specified requirements from PEFC Denmark and expertise within the sector. The certification body must: 1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary</p>

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
				requirements defined in this standard”
3.	Does the scheme documentation require that certification body chain of custody certification against PEFC ST 2002:2010 shall fulfil requirements defined in ISO Guide 65?	Annex 6, 3.1	Yes	For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.
4.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	Yes	PEFC DK 005-3 chapter 6.3: “The certification body must: ... 4. Have technical competence in forest management on its economic, social and environmental impacts.”
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	For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.
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	PEFC DK 005-3 chapter 6.3: “The qualification criteria for the certification bodies used in certification audits of sustainable forest management and group certification of sustainable forest management, are based on the “Requirements for bodies providing audit and certification of management systems” (DS/EN ISO/IEC 17021:2011), supplemented with specified requirements from PEFC Denmark and expertise within the sector. The certification body must: 1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard, and

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
				<p>2. Use a documented method, according to which the forest management may be audited and certified (certification procedure), and</p> <p>3. Have a good understanding of the Danish scheme, with regard to sustainable forest management.</p> <p>For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.</p>
7.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification?	Annex 6, 3.2	Yes	<p>PEFC DK 005-3 chapter 5.1: "At audits the certification body shall use a person with a professional expertise within forestry and forestry's environmental impact. This person shall have two years of practical experience with Danish forest management. Beside of that, at least one person with experience of certification procedure shall participate as well. The same person can handle both tasks."</p> <p>For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.</p>
8.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	Yes	<p>All ISO 19011 requirements are incorporated in ISO17021. PEFC DK 005-3, section 5.1: "The auditors must: 1. Fulfil the general criteria, as appropriate, for environmental auditors defined in DS/EN ISO/IEC 17021:2011"</p>
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>PEFC DK 005-3 chapter 5.1: "At audits the certification body shall use a person with a professional expertise within forestry and forestry's environmental impact. This person shall have two years of practical experience with Danish forest management. Beside of that, at least one person with experience of certification procedure shall participate as well. The same person can handle both tasks."</p>
Certification procedures				
10.	Does the scheme documentation require that certification bodies shall have established internal procedures for	Annex 6, 4	Yes	<p>PEFC DK 005-3 chapter 6.5 : "The certification body shall establish internal procedures for sustainable forest management certification and auditing, including group certification of sustainable forest management, according to</p>

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
	forest management and/or chain of custody certification?			the Danish scheme.”
11.	Does the scheme documentation require that applied certification procedures for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 4	Yes	PEFC DK 005-3 chapter 6.5 : “The procedures shall fulfil the requirements in DS/EN ISO/IEC 17021:2011.”
12.	Does the scheme documentation require that applied certification procedures for chain of custody certification against PEFC ST 2002:2010 shall fulfil or be compatible with the requirements defined in ISO Guide 65?	Annex 6, 4	Yes	For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.
13.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	Yes	All ISO 19011 requirements are incorporated in ISO17021. PEFC DK 005-3, section 6.5: “The certification body shall establish internal procedures for sustainable forest management certification and auditing, including group certification of sustainable forest management, according to the Danish scheme. The procedures shall fulfil the requirements in DS/EN ISO/IEC 17021:2011.”
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	PEFC DK 005-3: “The certification body shall inform PEFC Denmark about all issued forest management and group certificates and changes concerning validity and scope of these certificates” For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.
15.	Does the scheme documentation require	Annex 6, 4	Yes	ISO/IEC 17021:2011 section 9.3.2.1 h: “The surveillance audit programme shall include, at

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
	that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?			least: (...) h) use of marks and/or any other reference to certification.”
16.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	Yes	PEFC DK 6.5.7: “The certification body shall carry out surveillance audits of certified forest properties and group leaders at least once a year during the validity of the certificates to verify continued compliance with the requirements in the Danish scheme.”
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>PEFC DK 005-3: “The certification body must:</p> <p>1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard.”</p> <p>The maximum assessment period or validity period of forest management certificates is regulated through the ISO 17021 standard. As described in ISO 17021, section 9.1.1.2, the certification cycle may not exceed 3 years.</p> <p>For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.</p>
18	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	Yes	PEFC DK 005-3 chapter 6.5.4: “The summary of the certification report shall be made available to the public by the certification body.”
19	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	Yes	PEFC DK 005-3 chapter 6.5.3: “Public consultation. Before the conformity assessment with “ <i>PEFC Denmark’s Forest Management Standard – PEFC DK 001-3</i> ”, relevant external stakeholders shall be consulted, with a time limit of at least 14 days. The public consultation shall at least be announced at the certification body’s homepage. Relevant information from external parties shall subsequently be included in the assessment as appropriate.”
20.	Does the scheme documentation include additional requirements for certification procedures? [1]	Annex 6, 4	Yes	PEFC DK 005-3 chapter 6.4 (6.4.1 – 6.4.4) contains the additional requirements for certification procedures: “PEFC Denmark’s supplementary requirements to DS/EN ISO/IEC 17021:2011 for certification bodies operating certification of sustainable forest management and group certification of sustainable forest

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
				management under the Danish system are specified as follows”.
Accreditation procedures				
21.	Does the scheme documentation require that certification bodies carrying out forest management and/or chain of custody certification shall be accredited by a national accreditation body?	Annex 6, 5	Yes	PEFC DK 005-3 chapter 6.1: “The accreditation can be issued by the Danish Accreditation and Metrology Fund – DANAK, or by an equally acknowledged accreditation body, which has signed the multilateral agreement on mutual recognition developed by the European co-operation for Accreditation (EA) and is a member of IAF (International Accreditation Forum).”
22.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	Yes	PEFC DK 005-3 chapter 6.6: “The certificates shall as a minimum contain information about: (...)- Accreditation symbol of the relevant accreditation body”
23.	Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF’s special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	Annex 6, 5	Yes	PEFC DK 005-3 chapter 6.1: “The accreditation can be issued by the Danish Accreditation and Metrology Fund – DANAK, or by an equally acknowledged accreditation body, which has signed the multilateral agreement on mutual recognition developed by the European co-operation for Accreditation (EA) and is a member of IAF (International Accreditation Forum).”
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	Annex 6, 5	Yes	PEFC DK 005-3 chapter 6.1: “Certification bodies carrying out forest management certification and/or group certification of sustainable forest management shall be accredited to do this.” PEFC DK 005-3 chapter 6.3: “The qualification criteria for the certification bodies used in certification audits of sustainable forest management and group certification of sustainable forest management, are based on the “Requirements for bodies providing audit and certification of management systems” (DS/EN ISO/IEC 17021:2011), supplemented

No.	Question		Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
	custody standard(s) shall be covered by the accreditation scope?				with specified requirements from PEFC Denmark and expertise within the sector. The certification body must: 1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard,”
25.	Does the scheme documentation require that certification body undertake chain of custody certification against PEFC ST 2002:2010 as “accredited certification” based on ISO Guide 65?	Annex 6, 5	Yes		For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.
26.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	Yes		PEFC DK 005-3 chapter 6.2: “Certification bodies carrying out forest management certification and/or group certification of sustainable forest management under the Danish scheme shall be PEFC notified by PEFC Denmark according to “ <i>PEFC Denmark’s requirements for notification of certification bodies PEFC DK 006-2</i> .”
27.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	Yes		PEFC DK 006-2: “The certification body applying for PEFC notification from the PEFC Council shall: - Be a legal entity; - Agree to be listed on the publicly available PEFC Council Internet database including the certification body’s identification data and / or other data as specified in the <i>Internal Rules for the PEFC Registration system</i> ; - Have valid accreditation issued, by a national accreditation body which is a part of the European co-operation for Accreditation (EA) and/or the International Accreditation Forum (IAF) umbrella and have signed the agreement of mutual recognition. The accreditation shall be issued against ISO Guide 65 (General requirements for certification / registration bodies operating product certification) and supplementary requirements defined by PEFC Denmark in “ <i>PEFC Denmark’s Guidelines for auditors and certification bodies – PEFC DK 005-2</i> ”. The scope of the accreditation shall explicitly include “ <i>PEFC Denmark’s forestry standard – PEFC DK 001-2</i> ”and/or “ <i>PEFC Denmark’s Guidelines for certification of umbrella organisations – PEFC DK 003-3</i> ” and/or Annex 4 (<i>Chain of Custody of Forest</i>

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
				<p><i>Based Products – Requirements);</i></p> <p>- Sign a PEFC notification contract with the PEFC Denmark (<i>Appendix 1</i>).</p>

* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

[*1] This is not an obligatory requirement

MINIMUM REQUIREMENTS CHECKLIST FOR ADMINISTRATION OF PEFC SCHEME –

COMPLAINTS AND DISPUTE PROCEDURES (PEFC GD 1004:2009)

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
Requirements for administration of PEFC Scheme – Complaints and dispute procedures				
1	Does the scheme documentation procedures for dealing with complaints relating to the governance and administration of the PEFC scheme?	Section 8.1	Yes	<p>Danish scheme document, section 10: “Appeals, complaints and disputes relating to issuance and withdrawal of certificates shall be brought before and handled by the certification body’s own procedures.</p> <p>An appeal committee appointed by PEFC Denmark (“<i>Statutes of PEFC Denmark</i>”, §7) shall deal with other complaints and disputes arising from implementation and interpretation of the Danish scheme that cannot be addressed in the dispute settlement procedures of the relevant certification or accreditation body”</p> <p>PEFC Denmark Statutes, §7: “§7 Appeal Committee</p> <p>7.1 The Board of PEFC Denmark has the overall responsibility to handle and solve disputes and complaints related to certification under the Danish scheme, which cannot be solved by the certification bodies’ or accreditations bodies’ own procedures.</p> <p>7.2 Two distinct types of situations, where an appeal committee are needed, can arise:</p> <ul style="list-style-type: none"> • Disputes relating to the implementation of the requirements in the Danish scheme in tangible cases. • Complaints concerning the clarity and interpretation of the requirement in the

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
				<p>Danish scheme.</p> <p>An appeal committee shall be established if an agreement between the involved parties cannot be obtained.</p> <p>7.3 An application for settlement of complaints and disputes shall be addressed in writing to the Board of PEFC Denmark together with relevant documentation. The Board assess whether the disputes and complaints fall within the two types defined in § 7.2</p> <p>7.4 An impartial appeal committee with the necessary expertise to evaluate the complaints and disputes shall be established if the conditions in § 7.3 are fulfilled. The appeal committee are established on ad hoc basis. The appeal committee shall consist of 3 members. Each part appoints 1 member. The two members agree on the third member, who at the same time shall act as chairman for the appeal committee. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the Board of PEFC Denmark.”</p>
2a	Does the complaint procedure provide for acknowledgement of the complaint to the complainant upon receipt of the complaint?	Section 8.2a	Yes	<p>Danish scheme document, section 10: “Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint/dispute to the complainant, - gather and verify all necessary information to validate the complaint/dispute - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7). - Based on the recommendation from the appeal committee decide on the appeal <p>Formally announce the result and information about the complaint procedure to the complainant“</p>
2b	Does the complaint procedure provide for gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint upon receipt of the complaint?	Section 8.2b	Yes	<p>Danish scheme document, section 10: “Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint/dispute to the complainant, - gather and verify all necessary information to validate the complaint/dispute - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7).

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
				<p>- Based on the recommendation from the appeal committee decide on the appeal</p> <p>Formally announce the result and information about the complaint procedure to the complainant“</p>
2c	Does the complaint procedure provide for formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties upon receipt of the complaint?	Section 8.2c	Yes	<p>Danish scheme document, section 10: “Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint/dispute to the complainant, - gather and verify all necessary information to validate the complaint/dispute - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7). <p>- Based on the recommendation from the appeal committee decide on the appeal</p> <p>Formally announce the result and information about the complaint procedure to the complainant“</p>
2d	Does the complaint procedure provide for appropriate corrective and preventive actions?	Section 8.2d	No	<p>PEFC DK Statutes, §7:</p> <p>"§7 Appeal Committee</p> <p>7.1 The Board of PEFC Denmark has the overall responsibility to handle and solve disputes and complaints related to certification under the Danish scheme, which cannot be solved by the certification bodies' or accreditations bodies' own procedures.”</p> <p>No reference is found that PEFC Denmark will use the experience and outcomes of complaint and dispute procedures to formulate appropriate corrective and preventive actions.</p>

ANNEX 2: QUESTIONNAIRES FOR PUBLIC CONSULTATION

Questionnaires were sent out on 19 September 2012. The table below shows the list of questions asked.

Questionnaire for the standard-setting process of the second revision of the Danish PEFC scheme

Question to stakeholder	Answer	Explanation / Remark
1. What stakeholder category do you represent? a) forest owner/manager b) forest and timber industry c) Non-governmental organisation (environmental or social) d) Trade e) Labour union f) Government institution g) Research institute		
2. Did the working groups have a balanced representation of various stakeholder categories and covering the whole geographical scope of the country?		
3. In your opinion, have all stakeholders been proactively identified and invited that are relevant to the standard-setting, including disadvantaged and key stakeholders?		
4. Did you participate in one or both of the working groups? If yes, what was your main concern and interest to participate in the standard-setting and revision process? If no, why not?		
5. Did all stakeholders in the working group have expertise relevant to the subject matter of the standard?		
6. Are you aware of any substantive and procedural complaints relating to the standardising activities brought forward by you or other stakeholders? If this is the case, have these complaints been validated and objectively evaluated?		
8. Have records been kept of the standard-setting process?		
9. Have all working draft documents been available to all members of the working group/committee?		
9. Have you been provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts?		
10. Have comments and views submitted by any member of the working group/committee been considered in an open		

and transparent way?		
11. Has the public consultation of the revised scheme documentation lasted for at least 60 days?		
12. Have all comments received during the public consultation been considered in an objective manner by the working group/committee?		
13. Was pilot testing of the new standards carried out? If yes, have the results of the pilot testing been considered by the working group/committee?		
14. Was the decision of the working group to recommend the final draft for formal approval taken on the basis of a consensus? In case on certain issues no consensus was reached, was the issue resolved in a different manner? Please describe how.		

Annex 3: PEFC Denmark's comments to the interim report Including FORM comments on PEFC DK comments

FORM has inserted comments to the PEFC Denmark comments in yellow.

PEFC Denmark has received the "First Interim Report - Conformity Assessment Of the revised Danish Forest Certification Scheme" on 16th October with a deadline for comments from PEFC Denmark on the 31th October. FORM International has identified a number of non-conformities in the Danish Scheme in order to fulfill requirements from PEFC International.

PEFC Denmark's board of directors discussed the findings at their meeting on 23th of October and suggested some few amendments to the scheme documentation - especially the Forest management standard (PEFC DK 001-x) and a new set off standard setting procedures was endorsed (PEFC DK 008-2). The working groups was informed by mail about the amendments made by the board and got a possibility to send in comments if any members found the amendments to be in conflict with the consensus reach in the group. A few comments and suggestions for wording was received but there was not identified any oppositions and all working group members accepted the amendments.

At the same board meeting the new international standard "Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2012)" was formally adopted by the Danish board as the requirements for certification bodies operation chain of custody certification against the International chain of custody standard in Denmark.

Following documents has been changed:

Document	Title
The Danish PEFC Certification Scheme for sustainable forest Management	Danish Scheme doc.
PEFC Denmark's Forestry standard	PEFC DK 001-3
PEFC Denmark's Requirements for group certification of sustainable forest management	PEFC DK 003-4
PEFC Denmark's Requirement for certification and accreditation procedures	PEFC DK 005-3
Procedure for development and revision of the Danish PEFC certification scheme	PEFC DK 008-2

The amendments in the documents are marked with **green**.

Other Supplementary documents (only in Danish):

Document	Title
Minutes from 38 th board meeting	Bm38PEFC
Plan for revision process agreed at the 38 th board meeting	Bilag 6 til 38 møde

New references to the changed documents together with supplementary evidence for fulfillment of PEFC requirements has been added to the “checklist” (enclosed) made by FORM in a new column “PEFC Denmark” for all the identified non conformities.

Comments to the report:

1 Section 1.3b): Assessment of the scheme implementation procedures

It seems that the references to PEFC International documents is to old document.

This is corrected.

2 Section 3.2 – Standard setting procedures

For Standard setting procedures and revision process FORM has identified 26 non conformities. Most of the non conformities relates to the written procedures and some for the process at the beginning of the revision process.

This has a natural explanation since PEFC Denmark started the revision process in September 2010. At that time it was still the old requirements from PEFC Council (annex 2) that was valid. The New requirement for which our revision process has been asses against (PEFC ST 1001:2010) entered into force 15th may 2011.

PEFC Denmark regrets that we have not been specific enough in our application about our standard setting procedure and the process. I will try to describe the process in some more details as supplement to the development report:

The Danish Board decided in spring 2010 at the 38th meeting to start the revision process in the autumn 2010 in order to be in due time before the endorsement of the Danish scheme expired. At that meeting a plan and timetable was discussed and agreed upon. (Minutes from the meeting and plan are enclosed). At that time the Danish standard setting procedures was checked against Annex 2 to PEFC Technical document (rules for standard setting).

The secretariat prepared the process during the summer 2010 and at the board meeting 7th September 2010 the board conducted a stakeholder mapping based on a proposal from the secretariat. The key stakeholders were identified and some few other stakeholders that could have interest in the revision were added to the list of stakeholders. To this should be added that forestry in Denmark is a small industry and stakeholders with an interest in forestry is very limited. On the other hand, there is a good cooperation between stakeholders and they are willing to contribute to discussions and solutions concerting forest and forest management.

At that start of the process it was still the old requirements from PEFC Council (annex 2) that was valid and the new requirement was still just a draft. All the way through the revision

process PEFC Throughout the process Denmark has done our best to secure that the revision process followed the requirements from PEFC International.

The Danish requirements for standard setting were sent out together with the invitation. Just before the first meeting in the working group the new requirements from PEFC Council was formally approved and was presented to the two working groups and the groups were prepared to follow these new requirements for the process in the working group. This is also the reason why Form has found the process to be in line with PEFC Internationals requirements form the work in the working group was started.

We regret that PEFC Denmark did not revise our written procedures in the middle of the process but are pleased to recognize that FROM has found that our revision process as general has been implemented according to PEFC minimum requirements.

PEFC Denmark has now revised our Procedure for development and revision of the Danish PEFC certification scheme PEFC DK 008-2 to fulfill the requirement in PEFC ST 1001:2010.

For references to documents that provide evidence that the found non conformities for standard setting procedures and the process has been handled by PEFC Denmark please see "Checklist"

See remarks in checklist

3 Section 3.3 - Group Certification procedures

For Group Certification of forest management FORM has identified one non conformity. FORM state that the term "group organisation" has not been defined in the Danish scheme. In PEFC ST 1002:2010 section 1 "scope" a note says:

"The term "group certification" is equivalent to the term "regional certification" or other terms chosen by individual forest certification schemes where a number of individual forest owners are certified under one certificate"

And the definition of the "**group organization**" in PEFC ST 1002:2010 section 3 says:

*"A group of **participants** represented by the **group entity** for the purposes of implementation of the sustainable forest management standard and its certification.*

Note1: The term "group organisation" is equivalent to the term "region" or other terms chosen by the relevant forest certification scheme and complying with the content of this definition.

Note 2: The relationship between the terms "group organisation", "group entity" and "participant" is shown in Figure 1."

Regional certification is not an option in Denmark and due to the definition of the term "group organization" it will just be an artificial level in the Danish scheme. We have the term "**group leader**" which is equivalent with the term "**group entity**" and our term "**Group members**" which is equivalent with the term "**participant**", together these to terms clearly

defines the responsibilities in group certification of sustainable forest management in the Danish Scheme.

The consultant is of the opinion that the group organization needs to be defined and is not necessarily the same as a region. It may very well be a group as known in the Danish situation. Note 1 to section 3.5 is a specific example of a group, but not every group organisation is a region. This non-conformity still has to be addressed.

4 Section 3.4 - Forest Management Standard (FMS)

For the Forest management standard FORM has identified 19 non conformities. Many of the non conformities relates to forest management planning, while for other of PEFC Internationals requirements is lacking better references to Danish legislation in order for FORM to be able to asses the fulfillment of the requirements.

PEFC Denmarks board of directors has discussed the findings and has made some amendments and clarifications to PEFC Denmarks forest management standard, which also has been accepted by the working groups.

For references to documents and national legislation that provide evidence that the Danish Scheme fulfill the found non conformities for forest management standards please see "Checklist"

See remarks in checklist

5 Section 3.5 - Certification and Accreditation Procedures

For certification and accreditation procedures FORM has identified 9 non conformities, where of 8 relates to missing reference to procedures regarding the procedures for certification and accreditation of chain of custody certification. International requirements for certification bodies operating chain of custody according to the international chain of custody standard was prepared when PEFC Denmark started the revision and was expected to be adopted before we where ready for application for re-endorsement. Somehow the final approval of the new international requirements for certification bodies operating chain of custody was delayed, and it was not possible to make references to this new standard in the Danish scheme.

PEFC Denmark sent in application for re-endorsement on the 3rd of May 2012 and the new international standard "Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2012)" was approved by PEFC International 6th of July 2012.

PEFC Denmark formally approved the international standard (PEFC ST 2003:2012) at their meeting on the 23rd of October and it has been incorporated in to the Danish scheme.

For references to documents that provide evidence that the Danish Scheme fulfill the found non conformities for certification and accreditation procedures please see “Checklist”

The adoption of PEFC ST 2003:2012 has solved most non-conformities.
Further, see remarks in checklist

6 Section 3.6 - Complaints and Dispute Resolution Procedures

By mistake PEFC Denmark did not provide evidence for this part in the checklist – since it is not included in the version available at www.pefc.org.

For reference to documents that provide evidence that PEFC Denmark has in place complaints and dispute resolution procedures that fulfill requirements from PEFC Council please see “Checklist”

See remarks in checklist

Guidelines PEFC Council Minimum Requirements Checklist	Revised on 26 th May 2011	GL 2/2011
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PEFC Council Minimum Requirements Checklist

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OBJECTIVE

The objectives of this guideline are (i) to assist bodies, which develop or revise their forest certification schemes and preparation of an application for PEFC Council endorsement, and (ii) to facilitate the assessment of the compliance of a national or sub-national forest certification scheme against the PEFC Council requirements carried out by the PEFC Council as a part of its endorsement and mutual recognition process (*Annex 7 Endorsement and Mutual Recognition of National Schemes and their Revision*).

SCOPE

These guidelines cover the PEFC Council minimum requirements, which shall be met by national and sub-national schemes and standards applying for PEFC Council endorsement and mutual recognition as per chapter 4, Annex 7 (*Endorsement and Mutual Recognition of National Schemes and their Revision*), and are a part of the application for the PEFC Council endorsement and mutual recognition as defined by chapter 5, Annex 7 (*Endorsement and Mutual Recognition of National Schemes and their Revision*).

These guidelines were adopted by the PEFC Council Board of Directors on 2 April 2003 and revised on 27 January 2005, 28 April 2005, 26 January 2006 26 January 2007, 31 January 2008 4 February 2010 and 26 May 2011.

LIST OF DOCUMENTS AND THEIR ABBREVIATIONS

Document	Abbreviation
PEFC Denmark Application	Application letter
Report on the Danish Certification System technical document revision process	Development report
The Danish PEFC Certification Scheme for sustainable forest management	Danish Scheme doc.
PEFC Denmark's Forestry standard	PEFC DK 001-3
PEFC Denmark's Requirements for group certification of sustainable forest management	PEFC DK 003-4
PEFC Denmark's Requirement for certification and accreditation procedures	PEFC DK 005-3
PEFC Denmark's requirements for notification of certification bodies	PEFC DK 006-2
Terms and definitions	PEFC DK 007-2
Procedure for development and revision of the Danish PEFC certification scheme – rev 2	PEFC DK 008-1
PEFC Denmark's statutes	PEFC Denmark's statutes
The Danish Forest Act	DFA
Comments from public consultation with PEFC DK responses	HøringssvarsamletPEFC bemærk2
Revised draft standard after public consultation	PEFC DK 001-X SkovstandardUDKAST4
List of unresolved issues	Udeståender
Minutes working groups	Minutes working groups
Minutes board meeting	Minutes board meeting

PART I: MINIMUM REQUIREMENTS CHECKLIST FOR STANDARD SETTING (PEFC ST 1001:2010)

1 SCOPE

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

2 CHECKLIST

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
Standardising Body					
<p>4.3 The standardising body shall keep records relating to the standard-setting process providing evidence of compliance with the requirements of this document and the standardising body's own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request.</p>	Procedures	No	<p>PEFC DK 008-1, section 9: "The following shall be observed to ensure transparency in the process: • A report describing the revision process shall be made to document the fulfilment of the procedures, • All working drafts and final documents relevant for the task of revision shall be available for all members of the working group, • All working drafts and final documents endorsed by the board of PEFC Denmark shall be publicly available on the webpage of PEFC Denmark."</p> <p>No requirement was found that records must be kept for five</p>	<p>FORM has identified that "No requirement was found that records must be kept for five years."</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 9:</p> <p>The following shall be observed to ensure transparency in the process:</p> <ul style="list-style-type: none"> • A report describing the revision process shall be made to document the 	conforms

Question		Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			years.		<p>fulfilment of the procedures,</p> <ul style="list-style-type: none"> All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC Denmark in due time. All documents shall be kept for a minimum of five years and shall be available to interested parties upon request. 	
4.4 The working group/committee shall:						
a) be accessible to materially and directly affected stakeholders	Process	No	<p>Development report: “PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page.”</p> <p>PEFC DK invited 35 organisations directly, including directly and</p>	<p>FORM has identified: “No evidence was found that it was communicated to other stakeholders than the invited ones that they could also had possibilities to join the working groups”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process. In</p>	<p>The consultant accepts this explanation provided by PEFC DK, in combination with the revisions to the standard setting procedures to better comply with this requirement in future.</p>	

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>materially affected stakeholders.</p> <p>The web announcement informed the general public about the start of the process and the list of invited organisations. No evidence was found that it was communicated to other stakeholders than the invited ones that they could also had possibilities to join the working groups.</p>	<p>Annex 2, section 3.4.1 it is required:</p> <p><i>“The process of development of certification criteria shall be initiated by national forest owners’ organisations or national forestry sector organisations having the support of the major forest owners’ organisations in that country. All relevant interested parties will be invited to participate in this process”</i> (PEFC DK’s highlighting)</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>	<p>Procedures</p>	<p>No</p>	<p>PEFC DK 008-1, section 5: “The invited parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other</p>	<p>FORM has noticed that <i>“The scheme documentation does not explicitly require from working group members to have the relevant expertise or be able to influence the implementation of the standard.”</i></p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process</p> <p>In the revised standard setting procedures it has been implemented</p>	<p>conforms</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>relevant organisations at national or sub-national level... In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The board of PEFC Denmark compiles the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”</p> <p>The scheme documentation does not explicitly require from working group members to have the relevant expertise or be able to influence the implementation of the</p>	<p>PEFC DK 008-2, section 5:</p> <p>...</p> <p>The working group shall contain stakeholders:</p> <ul style="list-style-type: none"> - with expertise relevant to the subject matter of the standard - that are materially affected by changes in the standard, - that can influence the implementation of the standard <p>....</p>	

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			standard.		
4.5 Upon receipt of the complaint, the standard-setting body shall:					
a) acknowledge receipt of the complaint to the complainant,	Procedures	No	<p>PEFC DK 008-1, section 10: “Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the board of PEFC Denmark. The complaint must be substantiated. The board shall appoint an impartial appeal committee with the necessary expertise to evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark.”</p> <p>There is no mention in the scheme documentation of acknowledgement of</p>	<p>FORM has noticed that “<i>There is no mention in the scheme documentation of acknowledgement of receipt of the complaint to the complainant.</i>”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process</p> <p>In the revised standard setting procedures it has been implemented</p> <p>PEFC DK 008-2, section 10:</p> <p>Upon receipt of the complaint, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint to the complainant, - gather and verify all necessary information to validate the complaint - appoint an impartial appeal 	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			receipt of the complaint to the complainant.	<p>committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark.</p> <ul style="list-style-type: none"> - Based on the recommendation from the appeal committee decide on the appeal <p>Formally announce the result and information about the complaint procedure to the complainant</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	No	PEFC DK 008-1, section 10: "Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the board of PEFC Denmark. The complaint must be substantiated. The board	<p>FORM has noticed that "No mention is made that all necessary information is gathered to validate the complaint."</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>shall appoint an impartial appeal committee with the necessary expertise to evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark.”</p> <p>No mention is made that all necessary information is gathered to validate the complaint.</p>	<p>implemented</p> <p>PEFC DK 008-2, section 10:</p> <p>Upon receipt of the complaint, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint to the complainant, - gather and verify all necessary information to validate the complaint, - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark. - Based on the recommendation from the appeal committee decide on the appeal, - Formally announce the result and information 	

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<p>about the complaint procedure to the complainant</p>	
<p>c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.</p>	<p>Procedures</p>	<p>No</p>	<p>PEFC DK 008-1, section 10: "Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark."</p> <p>The procedure does not describe formal communication to the complainant concerning decision nor handling process</p>	<p>FORM has noticed that "The procedure does not describe formal communication to the complainant concerning decision nor handling process"</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented</p> <p>PEFC DK 008-2, section 10:</p> <p>Upon receipt of the complaint, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint to the complainant, - gather and verify all necessary information to validate the complaint - appoint an impartial appeal committee with the 	<p>conforms</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<p>necessary expertise to impartially and objectively evaluate the complaint. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the board of PEFC Denmark.</p> <ul style="list-style-type: none"> - Based on the recommendation from the appeal committee decide on the appeal <p>Formally announce the result and information about the complaint procedure to the complainant</p>	
<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.</p>	<p>Procedures</p>	<p>No</p>	<p>PEFC DK 008-1, section 10: “Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the board of PEFC Denmark.”</p> <p>No mention is made where people with enquiries should turn to. No clear contact point or</p>	<p>FORM has noticed that “No mention is made where people with enquiries should turn to. No clear contact point or procedure for easily available contact point is given.”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been specified</p>	<p>conforms</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			procedure for easily available contact point is given.	PEFC DK 008-2, section 10: “PEFC Denmark shall appoint a contact person for all inquiries in connection with revisions and new developments of standards. The contact person shall be easily accessible and contact details announced at PEFC Denmark’s web page. Procedural or substantive complaints in connection with the development or revision of the Danish PEFC certification scheme shall be sent to the contact person, who will distribute it to the board of PEFC Denmark. The complaint must be substantiated	
Standard-setting process					
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	No	PEFC DK 008-1, section 5: “All interested parties are invited to participate in the development and the 5 yearly revisions of the Danish PEFC certification system. It is not required that interested parties have to be members of PEFC Denmark. The invited	FORM has noticed that “ <i>There is no procedure for stakeholder mapping (defined in PEFC ST 1001:2010) or a similar procedure, which leaves the identification procedure undefined.</i> ” This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>parties shall represent the different interests relating to sustainable forest management and can include e.g. forest owners, forest industry, forestry related companies, environmental organisations, trade unions, research, labour unions, contractors, social organisations, retailers and other relevant organisations at national or sub-national level.”</p> <p>There is no procedure for stakeholder mapping (defined in PEFC ST 1001:2010) or a similar procedure, which leaves the identification procedure undefined.</p>	<p>In the revised standard setting procedures it has been specified</p> <p>PEFC DK 008-2, section 5:</p> <p>The board of PEFC Denmark defines the groups of stakeholders before the establishment of the working groups, based on a stakeholder mapping identifying relevant stakeholders related to the subject of the revision. The mapping exercise shall identify disadvantaged and key stakeholders and their key interest and what means of communication will best reach them. The composition of the group will depend on the areas and tasks to be handled by the group.</p>	
	Process	No	<p>Development report: “PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders.</p>	<p>FORM has noticed that “No evidence was found that stakeholder mapping or a similar procedure was applied for stakeholder identification”</p> <p>This was not a requirement in</p>	<p>PEFC DK has argued in addition that the board discussed the list of stakeholders prepared by the secretariat, the key stakeholders were identified and some few other stakeholders that could</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>The start of the revision was at the same time announced at the web-page.</p> <p>In the 40th PEFC DK board meeting of 7 September 2010 the list of organisations to invite for the working groups was decided on. No evidence was found that stakeholder mapping or a similar procedure was applied for stakeholder identification.</p>	<p>annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In annex 2, section 3.4.1 is required:</p> <p><i>“A Forum (e.g., committee, council, working group) shall be created to which interested parties are invited to participate in the process. The invited parties should represent the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, environmental and social non-governmental organisations, trade unions, retailers and other relevant organisations at national or sub-national level”</i></p> <p>Even though the process in the board where the list of stakeholders prepared by the secretariat was discussed and the key stakeholders were identified and some few other stakeholders that could have interest in the revision were added to the list of stakeholders, can be seen as a stakeholder mapping.</p>	<p>have interest in the revision were added to the list of stakeholders.</p> <p>This argumentation and the revision of the standard setting procedures PEFC DK 008-2 are sufficient proof that the available procedures have been observed and in future the right procedures are clear and can be followed.</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
<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.</p>	<p>Procedures</p>	<p>No</p>	<p>PEFC DK 008-1, section 4: “The initiation of the revision and development of new standards shall be publicly announced in a suitable manner (though homepage, news letters etc.)”</p> <p>The procedure does not require inclusion of invitations for participation and no time indication is provided.</p>	<p>FORM has noticed that “<i>The procedure does not require inclusion of invitations for participation and no time indication is provided</i>”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 7:</p> <p>” The start of the standard setting process will be advertised on PEFC Denmark’s web page.</p> <p>In connection with the start of the process the possibility to participate in the process shall be announced through an open invitation together with the possibility to comment on the procedures for development and revision of the standard”</p> <p>and</p> <p>PEFC DK 008-2, section 5:</p> <p>“Stakeholders shall be given at least one month to nominate their</p>	<p>conforms</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				representative to the working groups”	
	Process	No	<p>Development report: “PEFC Denmark sent out invitations to participate in the working groups on the 8th September 2010 to relevant stakeholders. The start of the revision was at the same time announced at the web-page.</p> <p>The direct invitations to stakeholders conform with the procedures and with a month response time. The web announcement does include a weblink to the standard setting procedures, which describes the process and public consultation options, but does not include an open invitation for participation in the working groups.</p>	<p>FORM has noticed that “<i>but does not include an open invitation for participation in the working groups.</i>”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p>	<p>The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation in the working groups. This is sufficient corrective action to comply in future with the current requirements.</p>
5.3 The announcement and invitation shall include:					

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
a) information about the objectives, scope and the steps of the standard-setting process and its timetable,	Procedures	No	No procedure found	<p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 5:</p> <p>The invitation shall include:</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme. 	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
b) information about opportunities for stakeholders to participate in the process,	Procedures	No	No procedure found	<p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 5:</p> <p>The invitation shall include</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and 	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				development of the Danish certification scheme.	
(c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,	Procedures	No	No procedure found	<p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 5:</p> <p>The invitation shall include:</p> <ul style="list-style-type: none"> - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly 	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				available standard-setting procedures for revision and development of the Danish certification scheme.	
	Process	No	The announcement on the web mentions that selected stakeholders have been invited, but the announcement does not contain an invitation to stakeholders that are not on the list developed by PEFC DK.	<p>FORM has noticed that “<i>but the announcement does not contain an invitation to stakeholders that are not on the list developed by PEFC DK</i>”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process, which is why this has not been explicitly specified in the invitation. The normal mentality in Denmark would though be to get in contact with PEFC Denmark if somebody had an interest in participating in the process.</p>	The inclusion of this open invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been adjusted and now require open invitation for participation of any interested party in the working groups. This is sufficient corrective action to comply in future with the current requirements.
d) an invitation to comment on the scope and the standard-setting process, and	Procedures	No	No procedures found	<p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				implemented: PEFC DK 008-2, section 5: The invitation shall include: - the objectives, scope and the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme.	
	Process		The web announcement does not contain an invitation to comment on the scope and the	FORM has noticed that <i>“but the announcement does not contain an invitation to stakeholders that are not on the list developed by PEFC</i>	The inclusion of this invitation was not a PEFC requirement in 2010 at the time PEFC Denmark started the process. Meanwhile, the procedures have been

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			standard setting process.	<p><i>DK</i></p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process, which is why this has not been explicitly specified in the invitation.</p> <p>But as described in the comments to the interim report the new standard setting requirements from PEFC Council was formally approved and was presented to the two working groups and the groups were prepared to follow these new requirements for the process in the working group. And at that time had a chance to comment on the procedures.</p>	adjusted and now require an invitation to comment on the scope and the standard-setting process. This is sufficient corrective action to comply in future with the current requirements.
e) reference to publicly available standard-setting procedures.	Procedures	No	No procedures found	<p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 5:</p> <p>The invitation shall include - the objectives, scope and</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<ul style="list-style-type: none"> - the steps of the standard-setting process, - a timetable, - information about opportunities to participate in the process, - an invitation to key stakeholders to nominate their representative to the working groups, - an invitation to comment on the scope and the standard-setting process, and - reference to the publicly available standard-setting procedures for revision and development of the Danish certification scheme. 	
<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</p>	<p>Procedures</p>	<p>No</p>	<p>PEFC DK 008-1, section 5: "In the working groups a balanced representation of stakeholders from different interest categories shall be provided. The board of PEFC Denmark compiles the working groups</p>	<p>FORM has noticed that "No procedure found for the review of the standard setting procedures or establishment/adjustment of the working groups taking into account comments received from the public announcement"</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC</p>	<p>conforms</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting.			<p>based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.”</p> <p>No procedure found for the review of the standard setting procedures or establishment/adjustment of the working groups taking into account comments received from the public announcement.</p>	<p>Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 7:</p> <p>The board of PEFC Denmark shall reconsider the presented procedures for standard setting taking in to account received comments from stakeholders and compile the working groups based on nominations done by the invited stakeholders. Any approval or denial of request for participation in the working group shall be based and explained in concerns to a balanced representation of stakeholders in the working groups or the available resources for the work.</p>	
	Process	No	All 11 stakeholders interested in participating in the revision were included in the working group. This was evidenced in the minutes of the 41 st PEFC DK	FORM notice that “ <i>The consultant understands that the PEFC DK Board accepted in its 40th meeting a revised version of the standard setting procedures PEFC DK 008-1, which had been revised to comply with PEFC ST 1001:2010. It</i>	PEFC DK complied with PEFC procedures that were the applicable requirements at the time standard setting started in 2010. Meanwhile the procedures have been adjusted to comply with current PEFC

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>Board meeting of 4 November 2011 and justified based on balanced representation.</p> <p>The consultant understands that the PEFC DK Board accepted in its 40th meeting a revised version of the standard setting procedures PEFC DK 008-1, which had been revised to comply with PEFC ST 1001:2010. It is unclear who was responsible for the revision. There is no evidence that the procedure has been opened for public consultation and reviewed based on stakeholder comments.</p>	<p><i>is unclear who was responsible for the revision. There is no evidence that the procedure has been opened for public consultation and reviewed based on stakeholder comments.</i></p> <p>To clarify:</p> <p>At the 40th board meeting the revision of the standard setting procedures PEFC DK 008-1, was not thoroughly revised. Only new reference to PEFC Council revised document was amended.</p> <p>Since it was not a requirement to give stakeholders possibility to comment, nor a requirement to review the procedures is has not been explicitly done.</p>	<p>requirements, which is sufficient to ensure compliance with PEFC procedures in future.</p>
5.5 The work of the working group/committee shall be organised in an open and transparent manner where:					
c) comments and views submitted by any member of the working group/committee shall be considered in an open and	Procedures	No	PEFC 008-1, section 6: "The work in the working group shall be based on an open dialog and	FORM notice that "No procedure found on recording of resolution and proposed changes of working	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
transparent way and their resolution and proposed changes shall be recorded.			<p>understanding and shall be organised with the objective of reaching consensus about the content of the standards.”</p> <p>No procedure found on recording of resolution and proposed changes of working group comments.</p>	<p><i>group comments”</i></p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented and is has been implemented during the work in the working group (as validated by form in the interim report).</p> <p>PEFC DK 008-2, section 6:</p> <p>“The work in the working group shall be based on an open dialog and understanding and shall be organised in a way that:</p> <ul style="list-style-type: none"> - All working drafts and final documents relevant for the task of revision shall be available for all members of the working group, - all members of the working group shall be provided with meaningful opportunities to contribute to the development of revision of the standard and submit comments to the working drafts, and - comments and views 	

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				submitted by any member of the working group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded“	
5.6 The standardising body shall organise a public consultation on the enquiry draft and shall ensure that:					
a) the start and the end of the public consultation is announced in a timely manner in suitable media,	Procedures	No	<p>PEFC DK 008-1, section 7: “Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation among relevant parties for at least 60 days.”</p> <p>There is no requirement to announce a public consultation to a general audience, only to selected stakeholders.</p>	<p>FORM notice that “<i>There is no requirement to announce a public consultation to a general audience, only to selected stakeholders.</i>”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented and is has been implemented during the work in the working group (as validated by form in the interim report)</p> <p>PEFC DK 008-2, section 7: “Thoroughly prepared drafts for new or revised standards are sent</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<p>out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days. Information about the consultation shall be sent directly to all stakeholders identified as relevant at the start of the process. Identified disadvantaged and key stakeholders shall be reach through the way of communication identified at the stakeholder mapping. The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated. A summery of the received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."</p>	
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	No	No procedures found	<p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<p>implemented</p> <p>PEFC DK 008-2, section 7:</p> <p>“Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days. Information about the consultation shall be sent directly to all stakeholders identified as relevant at the start of the process. Identified disadvantaged and key stakeholders shall be reach through the way of communication identified at the stakeholder mapping. The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated. A summery of the received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark’s web page, Information on this shall be sent to the parties who contributed with the observations.”</p>	
(f) a synopsis of received comments compiled from	Procedures	No	PEFC DK 008-1, section 7: “A summery of the	FORM notice that <i>“This does not include making a summary of this</i>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
<p>material issues, including the results of their consideration, is publicly available, for example on a website.</p>			<p>received observations and the consecutive processing of these in the working group shall, as a minimum requirement, be sent to the parties who contributed with the observations.”</p> <p>This does not include making a summary of this information public.”</p>	<p><i>information public”</i></p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented and is has been implemented during the work in the working group (as validated by form in the interim report)</p> <p>PEFC DK 008-2, section 7:</p> <p>“Thoroughly prepared drafts for new or revised standards are sent out for formal national public consultation in an appropriate way (homepage, newsletters etc) for at least 60 days. Information about the consultation shall be sent directly to all stakeholders identified as relevant at the start of the process. Identified disadvantaged and key stakeholders shall be reach through the way of communication identified at the stakeholder mapping. The incoming views of the interested parties outside the group are presented and discussed in the working group and relevant comments are incorporated. A</p>	

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				summary of the received observations and the consecutive processing of these in the working group shall be published at PEFC Denmark's web page, Information on this shall be sent to the parties who contributed with the observations."	
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.	Process	No	<p>PEFC DK states no pilot testing was deemed necessary due to the limited nature of changes in the standards.</p> <p>PEFC DK comment: "The Danish scheme has worked for 10 years and the changes in the forestry standard is not changed in a way that will require new pilot test. It was discussed in the working group and in the board and nobody found a need for pilot testing."</p> <p>According to PEFC Denmark's own procedures pilot testing is required for revised</p>	<p>It is true that PEFC Denmark did not follow our own procedures, but in stead followed the new requirement in PEFC ST 1001:2010 saying:</p> <p><i>"5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.</i></p> <p><i>Note: Pilot testing is not required in case of revision of a standard where experience from its usage can substitute for pilot testing."</i></p> <p>PEFC Denmark discussed the issue about need for pilot testing in both the working group and the board and found that experience from the two former periods can substitute for pilot testing.</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			standards. The SFM standard PEFC DK 001-3 has undergone major changes, mainly of structural nature.	In the revised procedures this has been specified: PEFC DK 008-2, section 8: " For revised standards new elements shall be tested in the field, if the working group believes that previous experience from certification can not substitute for this. Results from pilot testing and field test shall be published at PEFC Denmark's web page. Experiences gained at pilot testing and field test shall be incorporated in to the final standard."	
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	No	PEFC DK 008-1, section 6: "The work in the working group shall be based on an open dialog and understanding and shall be organised with the objective of reaching consensus about the content of the standards." This section does not detail through which	FORM has noticed that " <i>This section does not detail through which process consensus will be reached</i> " The requirement for detailed procedures concerning consensus was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process. In the revised standard setting procedures it has been	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			process consensus will be reached.	implemented: PEFC DK 008-2, section 6: “In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues: - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there is a verbal yes/no vote - an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response.”	
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures	No	PEFC DK 008-1, section 6: “The work in the working group shall be based on an open dialog and understanding and	FORM has noticed that “ <i>This section does not detail through which process consensus will be reached</i> ” The requirement for detailed	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>shall be organised with the objective of reaching consensus about the content of the standards.”</p> <p>This section does not detail through which process consensus will be reached.</p>	<p>procedures concerning consensus was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 6:</p> <p>“In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues:</p> <ul style="list-style-type: none"> - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there is a verbal yes/no vote - an e-mail communication where a request for agreement or objection is provided to members with the members providing a 	

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				written response.”	
	Process	No	PEFC DK indicates this option was not used.	In the PEFC requirement it is stated that “8 In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition” – FORM has found that PEFC Denmark has used option a og c.	conforms
c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or	Procedures	No	<p>PEFC DK 008-1, section 6: “The work in the working group shall be based on an open dialog and understanding and shall be organised with the objective of reaching consensus about the content of the standards.”</p> <p>This section does not detail through which process consensus will be reached.</p>	<p>FORM has noticed that “<i>This section does not detail through which process consensus will be reached</i>”</p> <p>The requirement for detailed procedures concerning consensus was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 6:</p> <p>“In order to reach a consensus the working group can utilise one or a</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<p>combination of the following alternative processes to establish whether there is sustained opposition to substantial issues.</p> <ul style="list-style-type: none"> - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there is a verbal yes/no vote. <p>an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response.”</p>	
d) combinations thereof.	Procedures	No	<p>PEFC DK 008-1, section 6: “The work in the working group shall be based on an open dialog and understanding and shall be organised with the objective of reaching consensus about the content of the standards.”</p> <p>This section does not</p>	<p>FORM has noticed that “<i>This section does not detail through which process consensus will be reached</i></p> <p>The requirement for detailed procedures concerning consensus was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p>	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
			<p>detail through which process consensus will be reached.</p>	<p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 6:</p> <p>“In order to reach a consensus the working group can utilise one or a combination of the following alternative processes to establish whether there is sustained opposition to substantial issues.</p> <ul style="list-style-type: none"> - a face-to face meeting in the working group where the chair through agreed voting procedures can conclude that there is no opposition - a telephone conference where there is a verbal yes/no vote. <p>an e-mail communication where a request for agreement or objection is provided to members with the members providing a written response.”</p>	
<p>5.10 Documentation on the implementation of the standard-setting process shall be made</p>	<p>Procedures</p>	<p>No</p>	<p>PEFC DK 008-1, section 9: “The following shall be observed to ensure transparency in the</p>	<p>FORM has noticed that “<i>This section does not detail through which process consensus will be</i></p>	<p>conforms</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
publicly available.			<p>process: • A report describing the revision process shall be made to document the fulfilment of the procedures”</p> <p>There is no requirement to make this report publicly available</p>	<p><i>reached</i></p> <p>The requirement for detailed procedures concerning consensus was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented:</p> <p>PEFC DK 008-2, section 9:</p> <p>The following shall be observed to ensure transparency in the process:</p> <ul style="list-style-type: none"> • A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmark's homepage • All final drafts and final documents endorsed by the board of PEFC Denmark, including the report describing the revision process shall be publicly available on the webpage of PEFC 	

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<p>Denmark in due time.</p> <ul style="list-style-type: none"> All documents shall be kept for a minimum of five years and shall be available to interested parties upon request. 	
<p>5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.</p>	<p>Procedures</p>	<p>No</p>	<p>PEFC DK 008-1, section 4: “The board shall according to § 5.6 in the statutes of PEFC Denmark, approve the developed and revised standards by simple majority.”</p> <p>It is not stated that approval shall be based on evidence of consensus in the working group.</p>	<p>FORM notice that “<i>It is not stated that approval shall be based on evidence of consensus in the working group</i>”</p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented and is has been implemented during the work in the working group (as validated by FORM in the interim report)</p> <p>PEFC DK 008-2,section 6:</p> <p>The decision of the working group to recommend the final draft to the board of directors for formal approval shall be taken on the basis of a consensus.</p>	<p>conforms</p>

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Procedures	No	<p>PEFC DK 008-1, section 9: "All working drafts and final documents endorsed by the board of PEFC Denmark shall be publicly available on the webpage of PEFC Denmark."</p> <p>No time frame indicated by PEFC DK.</p>	<p>FORM notice that <i>"No time frame indicated by PEFC DK."</i></p> <p>This was not a requirement in annex 2, which was the valid requirement at the time PEFC Denmark started the process.</p> <p>In the revised standard setting procedures it has been implemented and is has been implemented during the work in the working group (as validated by FORM in the interim report)</p> <p>PEFC DK 008-2,section 9:</p> <p>The following shall be observed to ensure transparency in the process:</p> <ul style="list-style-type: none"> • A report describing the revision process shall be made to document the fulfilment of the procedures, and shall be made public available at PEFC Denmarks homepage • All final drafts and final documents endorsed by the board of PEFC Denmark including the report describing the 	conforms

Question	Assess. basis*	YES /NO*	Reference to application documents	PEFC Denmark – comments	FORM Comments to PEFC DK response
				<p>revision process shall be publicly available on the webpage of PEFC Denmark in due time.</p> <ul style="list-style-type: none"> All documents shall be kept for a minimum of five years and shall be available to interested parties upon request. 	
Revisions of standards/normative documents					
<p>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.</p>	Process	No	<p>Development report: PEFC Denmark has carried out its second revision. The first revision was revised and endorsed in March 2008, with expiry date in March 2013. The second revision process started in September 2010 and lasted until March 2012. This is within the 5 year revision period.</p> <p>The procedures for revision did not follow those in chapter 5 in all cases.</p>	<p>PEFC Denmark has provided supplementing evidence and incorporated changes in order to fulfil this requirement.</p>	<p>The procedures in PEFC DK 008-1 for revision did not follow those in chapter 5 in all cases. In the revised version PEFC DK 008-2 the requirements in chapter 5 are met.</p>

3 APPLICATION DOCUMENTATION

The application for the endorsement and mutual recognition as defined in Chapter 5 of Annex 7 (*Endorsement and Mutual Recognition of National Schemes and their Revision*) shall include information which enables the assessment of the applicant scheme's compliance with the PEFC Council requirements.

The application documentation should identify and make reference to other detailed documentation such as minutes, internal procedures and rules, reports, etc. which do not need to create a part of the application documentation.

Asses. basis* The standard setting is assessed against the PEFC Council requirements in two stages: (i) compliance of written standard setting procedures ("Procedures") and (ii) compliance of the standard setting process itself ("Process").

For "Procedures" the applicant should refer to the part(s) of its standard setting procedures related to the respective PEFC requirement. For "Process" the applicant should either refer to the report/records of the standard setting process forming a part of the submitted application documents, or describe how the PEFC requirement was fulfilled during the standard setting process.

YES/NO* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

PART II: MINIMUM REQUIREMENTS CHECKLIST FOR GROUP FOREST MANAGEMENT CERTIFICATION (PEFC ST 1002:2010)

1 SCOPE

Part II covers requirements for group forest management certification as defined in PEFC ST 1002:2010, *Group Forest Management Certification – Requirements*.

2 CHECKLIST

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM Comments to PEFC DK response
General				
4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:				
a) the group organisation,	NO	PEFC DK 007-2, section 2: “Group certification of forest management: Certification of forest management of a group of small and medium sized forest owners under one certificate.”	As described detailed in the comments to the interim report PEFC Denmark does not have regional certification and find this level artificial in the Danish case.	<p>The consultant is of the opinion that the group organization needs to be defined and is not necessarily the same as a region. It may very well be a group as known in the Danish situation. Note 1 to section 3.5 is a specific example of a group, but not every group is a region.</p> <p>The requirement demands a clear definition for group organization and this is not present in the standard. Also, there is no figure showing the relations between group leader, participants and organization, like in the PEFC International standard, so this cannot serve as a substitute. For clarity purposes the group organisation shall</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM Comments to PEFC DK response
		<p>PEFC DK 003-4, section 5.5: “The group leader shall describe the structure of the organisation in relation to the activity as a group administrator, for example in an organisation chart. Procedures, roles, rights and duties for the work as a group leader shall be defined and distributed by the group leader. The management shall provide the necessary resources in order to carry out the work.”</p> <p>The group organization is not clearly defined, although from the context of PEFC DK 003-4 its structure and form become clear. For</p>		<p>be defined.</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM Comments to PEFC DK response
		clarity purposes the group organisation shall be defined.		

PART III: MINIMUM REQUIREMENTS CHECKLIST FOR SUSTAINABLE FOREST MANAGEMENT (PEFC ST 1003:2010)

1 SCOPE

Part III covers requirements for sustainable forest management as defined in PEFC ST 1003:2010, *Sustainable Forest Management – Requirements*.

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
General requirements for SFM standards				
Specific requirements for SFM standards				
Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle				
<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>	NO	<p>PEFC DK 100-3, section 7.4.1 & 7.4.2 :</p> <p>“4.1. The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard. The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management” <p>“The registrations shall be updated regularly and at least for every 10 years period. The written documentation for the forest property shall be available for the</p>	<p>FORM notice that “<i>No evidence found that management plan shall be based on legislation.</i>”</p> <p>PEFC Denmark has made a more detailed description of the forest management planning in our system description section 5.4.</p> <p>Here it is specified that there is no legal requirement for forest management planning:</p> <p>“The Danish forest act does not include requirement for forest management planning at the individual forest property, which is a little</p>	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>certification body conducting the audit. The documentation can be either an IT based management system, an existing management plan, a green management plan or similar.”</p> <p>No evidence found that management plan shall be based on legislation.</p>	<p>atypical compared to other countries in Europe. Forest owners neither are required to get logging permits nor notify the authorities before logging activities can be carried out.”</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>NO</p>	<p>PEFC DK 001-3, section 7.4.1: “4.1. The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard. The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management” <p>PEFC DK 001-3, section 7.4.2: “d) Forest maps showing certified areas... Each compartment is to be described at least with the following data:</p> <ul style="list-style-type: none"> ○ Size ○ Main species ○ Extent of important mixed species – description and percentage composition of species if stand is mixed ○ Age or year of establishment 	<p>FORM notice that “Requirement 7.1.3 addresses timber harvest levels. No evidence could be found though that management plans shall describe the annual allowable cut, including justification “</p> <p>PEFC Denmark has made the following amendment to the standard</p> <p>PEFC DK 003-3, section 7.4.2 e):</p> <p>e) Determination of the annual allowable cut in the planning period, including justification</p> <p>Further more it is required in 7.1.2 that</p> <p>The long term, stable forest</p>	<p>conforms</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>(may be based on professional judgement)</p> <ul style="list-style-type: none"> o Land use of areas without tree cover g) Guidelines for use of non-wood products from the forest, if relevant cf. criterion 1.3.” <p>PEFC DK 001-3, section 7.1.3: “The rate of harvest – both wood and non-wood forest products – must happen in a way that does not affect the long term productivity capacity of the site. For the production of wood, this is secured through compliance with the other requirements stipulated in this standard. If non-wood products from the forest are to be utilized commercially, the owner shall establish guidelines for the management to secure it does not affect the long term production capacity of the site. I 1.3.1. Evaluation of guidelines for use of non-wood products from the forest, if such a production takes place.”</p> <p>Requirement 7.1.3 addresses timber harvest levels. No evidence could be found though that management plans shall describe the annual allowable cut, including justification.</p>	<p>climate of the forest shall be maintained and continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> - Retaining sufficient stocking density on the property’s forest covered area. <p>And indicator I 1.2.3 says: Evaluation of the balance between harvest and increment</p>	
5.1.6 A summary of	NO	No requirement was found that a	FORM notice that “No	Modifications are still not

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>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>summary of the forest management plan or its equivalent shall be publicly available.</p>	<p>requirement was found that a summary of the forest management plan or its equivalent shall be publicly available “</p> <p>For Individually certified forest entities this is required through the certification body due :</p> <p>PEFC DK 005-3, section 6.4.4, where it has been more detailed described:</p> <p>“The certification report must include:</p> <ul style="list-style-type: none"> - A summary of the hearing of stakeholders - A summary of the report that includes: <ul style="list-style-type: none"> o Main data o Management objectives as required in section 7.4.1 of “PEFC Denmark’s forest management standard – PEFC DK 001-3”(only individually certified forest 	<p>sufficient to meet the requirements:</p> <p>Both the requirements for individual properties and group certified properties do not comply with the minimum requirement for a number of reasons:</p> <ul style="list-style-type: none"> • For individual properties the required summary regards the certification report, not the management plan. It is not acceptable that the auditor is the only responsible for publishing the public summary of the management plan, because it is the same auditor that has to verify the conformity of this requirement. This would cause a circular verification process as the auditor would have to check himself. This is not auditable. • For both individual and group certified properties PEFC DK requires as a minimum that management objectives

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			<p>properties) ○ Any deviations</p> <p>Confidential and personal information may be excluded from the summary. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these.</p> <p>The summary of the certification report shall be made available to the public by the certification body”</p> <p>For group certified entities the requirement has been added to the responsibility of the group leader and required to be accepted by forest owners:</p> <p>PEFC DK 003-4, section 5.3:</p> <p>Group leaders administer and organise group certification of forest properties. In doing so the group leader shall carry out the following functions:</p> <ul style="list-style-type: none"> - ... - Upon request from stakeholders, provide a summary of the 	<p>are included in the summary. This is not according to the requirement that the summary shall be appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied.</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
			<p>individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard. Confidential and personal information may be excluded. Information about cultural sites or sensitive natural resource features may be excluded in order to protect these.”</p> <p>And section 6: “By signing the agreement with the group leader, the group member is committed to accept and observe the following, as a minimum: 7) Upon request from stakeholders, the group leader to provide a summary of the individual forest management plan containing at least the management objective specified in section 7.4.1 of the forest management standard.”</p>	

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.</p>	<p>NO</p>	<p>No reference found in the scheme documentation that this is considered.</p>	<p>A new criteria and indicator has been amended: PEFC DK 001-3, section 7.1.3: 1.3 Planting of abandoned agricultural and other open areas within or in connection with the forest shall be considered, whenever it can add economic, ecological, social and/or cultural value without harming other values significantly. 1. 1.3.1: Value for the planting of abandoned agricultural and other open areas within or in connection with the forest is considered.</p>	<p>conforms</p>
<p>5.2.1 Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.</p>	<p>NO</p>	<p>PEFC DK 001-3, section 7.1.1: “The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area.” PEFC DK 001-3, section 7.1.2: “The long term, stable forest climate of the forest shall be maintained and</p>	<p>FORM notice that “<i>No requirement is found that the rehabilitation of degraded forest ecosystems shall be aimed for</i>” An amendment to the forest management standard has been made to fulfil the requirement: PEFC DK 001-3, section 7: 1.2 The long term, stable forest climate of the forest shall be maintained and</p>	<p>conforms</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retaining sufficient stocking density on the property's forest covered area. <input type="checkbox"/> Use of forest regeneration systems, which quickly and safely establishes a useful regeneration. This does not prevent the use of natural succession at suitable locations. <input type="checkbox"/> Use of forest regeneration systems, which will ensure permanent canopy cover, where this is silviculturally possible and is assessed economically justifiable. <input type="checkbox"/> Where it is not possible in a justifiable way to use forest regeneration methods that ensures a continued cover, clear cutting may be used. <input type="checkbox"/> Clear cuts shall have a shape and sizes that ensure a quick restocking and that the forest climate and the stability of the surrounding stand are not compromised, when carried out. Clear cuts shall not be used where a biologically rich nature is characterised by continuity in forest cover and/or stable hydrology. Especially the size and use of clear cuts shall be justifiable. 	<p>continuously improved. Fundamentally the silviculture shall therefore ensure creation of a larger freedom in choice of future regeneration methods. This shall be done in the following ways:</p> <ul style="list-style-type: none"> - - Rehabilitation of degraded forest ecosystems shall be aimed for, whenever this is possible by silvicultural means. 	

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		<p><input type="checkbox"/> The structure, size and tree species composition of the restocked area shall be adjusted according to the extent and structure of the forest, so as to ensure a good possibility for achieving a stable forest climate and future balanced logging cycles. Considerations must also be shown towards nature and culture values when planting. Restocking must take place within 3 growth seasons.</p> <p>This does not prevent establishment and management of open nature areas, areas with coppiced forests, silvopasture and intensive land management and other unconventional woodland practises as long as it come within the scope of the forest act and its exemption possibilities.”</p> <p>No requirement is found that the rehabilitation of degraded forest ecosystems shall be aimed for.</p>		
Criterion 2: Maintenance of forest ecosystem health and vitality				
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,	NO	PEFC DK 001-3, section 7.4.2: “A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period. ... c) A written procedure for the forest owner’s yearly evaluation of the forest	FORM notice that “No clear and auditable reference was found that any of these evaluations shall include monitoring of key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>		<p>management relating to the defined policy and objectives, including descriptions of recorded deviations in relation to the standard.”</p> <p>A 10 year revision cycle is required for some elementary records. Also, the certified organisation is required to carry out a yearly evaluation. No clear and auditable reference was found that any of these evaluations shall include monitoring of key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>	<p><i>and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations”</i></p> <p>An amendment to the forest management standard has been made to fulfil the requirement:</p> <p>PEFC DK 001-3, section 7: 2.14: Forest health and vitality shall be regularly monitored in relation to external factors such as pests, diseases, overgrazing, fire or damage caused by climatic factors that can affect forest health and vitality. When damage caused by such factors is determined, the impact of these on forest management shall be assessed. As a basis for the assessment data from national monitoring of forests (NFI) on forests current state and possible threats to forests and other information from Forest & Landscape Knowledge Service can be used.</p> <p>1.2.14.1: Regular monitoring has been carried out</p> <p>1.2.14.2: In the presence of damage, the impact has been</p>	

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<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>NO</p>	<p>PEFC DK 001-3, section 7.1.7: “On the areas not intensively managed, the use of pesticides (including rodenticides) shall be minimized. Appropriate silvicultural alternatives and other biological measures are to be preferred to the use of chemical pesticides (including rodenticides).”</p> <p>PEFC DK 001-3, section 7.2.12: “Invasive species shall be controlled where it is economically and practically possible and especially at the areas designated as biodiversity areas, hereunder untouched forest. The forest owner shall be familiar with the “black list” 5 and introduction of species on this list is not allowed.”</p> <p>PEFC DK 001-3, section 7.2.13: “Forest fires shall be avoided. Fires might however be used when they are a part of the nature management and necessary to achieve defined objectives. Fire protection plans are recommended and firebreaks should be established at vulnerable sites.”</p> <p>PEFC DK 001-3, section 7.2.15: “Wildlife management shall comply with the principles of multiple management use. This also applies to selection of locally adapted tree species and the possibilities for</p>	<p>assessed</p> <p>FORM notice that “No clear and auditable reference was found that any of these evaluations shall take into consideration the effects of naturally occurring fire, pests and other disturbances.”</p> <p>An amendment to the forest management standard has been made to fulfil the requirement:</p> <p>PEFC DK 001-3, section 7: 2.14: Forest health and vitality shall be regularly monitored in relation to external factors such as pests, diseases, overgrazing, fire or damage caused by climatic factors that can affect forest health and vitality. When damage caused by such factors is determined, the impact of these on forest management shall be assessed. As a basis for the assessment data from national monitoring of forests (NFI) on forests current state and possible threats to forests and other information from Forest & Landscape Knowledge Service can be used.</p> <p>1.2.14.1: Regular monitoring</p>	<p>conforms</p>

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		<p>natural regeneration.”</p> <p>PEFC DK 001-3, section 7.4.2: “A number of registrations shall be carried out preliminary to the certification of the property. The registrations shall be updated regularly and at least for every 10 years period. ... c) A written procedure for the forest owner’s yearly evaluation of the forest management relating to the defined policy and objectives, including descriptions of recorded deviations in relation to the standard.”</p> <p>A 10 year revision cycle is required for some elementary records. Also, the certified organisation is required to carry out a yearly evaluation. No clear and auditable reference was found that any of these evaluations shall take into consideration the effects of naturally occurring fire, pests and other disturbances.</p>	<p>has been carried out</p> <p>7.2.14.2: In the presence of damage, the impact has been assessed</p>	
<p>5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management</p>	<p>NO</p>	<p>Especially PEFC DK 001-3, section 7.4.2 was reviewed, but no requirement was found that the initial registrations shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Also, no evidence was found that forest management planning shall make use of those policy instruments set</p>	<p>FORM notice that “no requirement was found that the initial registrations shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems”</p> <p>An amendment to 7.1.1 in the</p>	<p>conforms</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>planning shall make use of those policy instruments set up to support these activities.</p>		<p>up to support these activities. The consultant interprets the Preliminary registrations as mentioned under 7.4.2 to be the equivalent of a management plan.</p>	<p>forest management standard has been made to fulfil the requirement: PEFC DK 001-3, section 7: 1.1 The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area. Further forest management shall be structured to minimise the risk of degradation of and damages to forest ecosystems. I.1.1.1: Evaluation of the owner's policy and objective. I.1.1.2: Planning as described in section 7.4 is implemented Further FORM notice that "Also, no evidence was found that forest management planning shall make use of those policy instruments set up to support these activities" An amendment to 7.4. in the forest management standard</p>	

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
			<p>has been made to fulfil the requirement:</p> <p>PEFC DK 001-3, section 7.4: “Available knowledge and data from research institutions, forest monitoring and counseling services, as appropriate, shall be used in the planning process and the grant schemes aimed at forestry that promotes forest policies shall be considered.”</p> <p>At last FORM notice that: “The consultant interprets the Preliminary registrations as mentioned under 7.4.2 to be the equivalent of a management plan.”</p> <p>The whole section 7.4 shall be considered as the management plan and especially section 7.4.1 where the forest owner are obliged to set up management objectives for the sustainable forest management.</p>	
Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)				
5.3.3 Forest management plans or their equivalents shall take into	NO	PEFC DK 001-3, section 7.1.1: “The forest management shall be structured to protect and improve the forest resources, including the	FORM notice that: “This requirement requires that different uses or functions are taken into account in	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>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>ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area.”</p> <p>PEFC DK 001-3, section 7.4: “A system for forest management planning for the forest property shall be established and maintained as described in the following. The section is divided into the following sub-sections:</p> <ul style="list-style-type: none"> - Management objectives - Preliminary registrations - Continuous registrations - Sale of certified wood - Chain of Custody (only for a partly-certified forest property).” <p>This requirement requires that different uses or functions are taken into account in management plans. However, insufficient evidence was found that all functions need to be taken into account sufficiently in management plans. Under section 7.4 there are mapping requirements that relate to different forest functions, but only for biodiversity areas and for non-wood forest products specific maintenance plans and guidelines need to be defined. More such guidelines and plans are</p>	<p><i>management plans. However, insufficient evidence was found that all functions need to be taken into account sufficiently in management plans. Under section 7.4 there are mapping requirements that relate to different forest functions, but only for biodiversity areas and for non-wood forest products specific maintenance plans and guidelines need to be defined. More such guidelines and plans are needed for management of productive forest and other areas as well. No requirement states that management plans shall include planning elements that will allow the manager to adequately take into account all uses and functions, such as assessments of appropriate aspects, timber harvesting plans, operational plans or management prescriptions.”</i></p> <p>HUSK</p> <p>Further FORM notice that: “No requirement was found that indicates that forest management planning shall</p>	

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>needed for management of productive forest and other areas as well. No requirement states that management plans shall include planning elements that will allow the manager to adequately take into account all uses and functions, such as assessments of appropriate aspects, timber harvesting plans, operational plans or management prescriptions.</p> <p>No requirement was found that indicates that forest management planning shall make use of policy instruments set up to support the production of commercial and non-commercial forest goods and services.</p>	<p><i>make use of policy instruments set up to support the production of commercial and non-commercial forest goods and services”</i></p> <p>An amendment to 7.4. in the forest management standard has been made to fulfil the requirement:</p> <p>PEFC DK 001-3, section 7.4: “Available knowledge and data from research institutions, forest monitoring and counseling services, as appropriate, shall be used in the planning process and the grant schemes aimed at forestry that promotes forest policies shall be considered”</p>	
Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems				
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	NO	<p>PEFC DK 001-3, section 7.2.10: “Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted</p>	<p>FORM notice that:” <i>Requirement 7.2.10 is not specific enough regarding minimisation of damage to rare, sensitive or representative ecosystems, genetic reserves, threatened or other key species – in particular their migration patterns. Requirement 7.2.8</i></p>	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>that takes threatened or other key species – in particular their migration patterns – into consideration.</p>		<p>to the locality and/or permanent skidding tracks and the timing of operations.”</p> <p>PEFC DK 001-3, section 7.2.8: “Activities impacting negatively on particularly vulnerable areas and species should be regulated.”</p> <p>Requirement 7.2.10 is not specific enough regarding minimisation of damage to rare, sensitive or representative ecosystems, genetic reserves, threatened or other key species – in particular their migration patterns. Requirement 7.2.8 could further encompass these issues, but is neither specific enough nor strong enough: should formulated instead of shall.</p>	<p><i>could further encompass these issues, but is neither specific enough nor strong enough: should formulated instead of shall.”</i></p> <p>In 7.2.8 “Should” is changed to “Shall”</p> <p>And an amendment to 7.2.10. in the forest management standard has been made to fulfil the requirement:</p> <p>“Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions and to avoid damage to rare, sensitive or representative ecosystems and genetic reserves.”</p>	
<p>Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)</p>				

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.</p>	<p>NO</p>	<p>PEFC DK 001-3, section 7.2.10: “Logging, transport and regeneration techniques which spare/protect the site and the stand shall be applied to ensure favorable soil conditions. Transport in the forest is carried out in a way that minimizes damages. Particularly significant damages caused by use of machinery shall be avoided through amongst other things, choice of machinery adapted to the locality and/or permanent skidding tracks and the timing of operations.”</p> <p>PEFC DK 001-3, section 7.2.11: “The spillage of oil and other substances harmful to the environment, through forest management operations or the indiscriminate disposal of waste on forestland, shall be strictly avoided.”</p> <p>The standard does not make a direct reference to water protection and avoidance of adverse effects to water quality and quantity by forest management, only the protection of sites, stands and soils are mentioned explicitly.</p> <p>Potentially relevant legislation such as the Nature Protection Act or the Water Supply Act were not available for review.</p>	<p>FORM notice that:” <i>The standard does not make a direct reference to water protection and avoidance of adverse effects to water quality and quantity by forest management, only the protection of sites, stands and soils are mentioned explicitly.</i></p> <p><i>Potentially relevant legislation such as the Nature Protection Act or the Water Supply Act were not available for review.”</i></p> <p>In Denmark water management planning and protection of the water environment is taken care of at national level due to different regulation in “miljømålsloven” (environmental objective act), and the water supply act</p> <p>Water Supply Act: The purpose of the Water Supply Act is “to ensure: the utilization and appropriate protection of water bodies is based on an overall planning and after an overall assessment, coordination of</p>	<p>conforms</p>

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			<p>existing water supply for the appropriate use of bodies of water, a planned development and operation of an adequate and satisfactory quality water supply” (google translate) and in section 3 is described the planning and in section 11 about environmental damage</p> <p>Environmental objective law EU Water Framework Directive is implemented in Danish legislation in environmental objective law.</p> <p>Environmental Act contains general provisions for water districts, authorities, responsibilities, environmental, planning and monitoring, etc.</p> <p>In Denmark most of the drinking water is ground water and represents a very substantial natural resource.</p> <p>To make sure that the forest owner are aware of the designated drinking water areas an amendment to section 7.4.2 in the forest management standard PEFC DK 001-3 has been added:</p>	

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
			PEFC DK 001-3, section 7.4.2 f) f) Registrations relating to map of: - - Areas with drinking water interests designated by the municipality	
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	NO	No specific requirements found for road construction. Sections 7.2.8 and 7.2.10 refer to any activities, and to logging and transport with a potential impact, but do not address road construction.	FORM notice that: “No specific requirements found for road construction. Sections 7.2.8 and 7.2.10 refer to any activities, and to logging and transport with a potential impact, but do not address road construction.” A new criterion has been amended to the forest	conforms

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function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.			<p>management standard in order to fulfil the requirement.</p> <p>PEFC DK 001-3: section 7:</p> <p>2.11: At construction of forest roads, crossings and other infrastructure in the forest it shall be ensured that the water environment is not negatively affected and that the natural level and the natural functions of streams are preserved. Furthermore, it shall be ensured that soil exposure is minimized. Proper drainage of newly built roads shall be installed and maintained.</p> <p>2.11.1: The natural level and the natural functions of streams are preserved at construction of forest roads, crossings and other infrastructure in the forest.</p> <p>2.11.2: Proper drainage of newly built roads are installed.</p>	
Criterion 6: Maintenance of other socio-economic functions and conditions				
5.6.1 Forest management planning shall aim to respect the multiple functions of forests to	NO	PEFC DK 001-3, section 7.4.1: "The forest owner shall define an objective for the sustainable forest management which is in accordance with the Forest Management Standard.	FORM notice that: "No evidence was found that due regard is given to rural development and new employment opportunities in	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>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>The objective shall contain:</p> <ul style="list-style-type: none"> • An overall objective for the forest property • All essential intermediate objectives and policies for the forest management” <p>PEFC DK 001-3, section 7.4.2: “e) Registrations relating to map of:</p> <ul style="list-style-type: none"> • Designated biodiversity areas, including untouched forest. • Registered conservation areas and § 3 protection areas of the Nature Protection Act registered by the authorities. • Other natural values. E.g. areas with a high biodiversity or with rare plants and/or animals, untouched forest, areas with old management practises, § 3 areas not registered by the authorities and areas of a significant size protected by § 28 in accordance to the Forest Act. Can be a 'registration of key woodland habitats, an assessment of natural values' or the owners own registration of the natural values at the property. • Areas with native species not allowed for conversion to introduced species, cf. criterion 1.10, if relevant. • Historic sites and relics registered by the authorities. • Access possibilities to the forest (roads and paths) and special installations for outdoor recreation 	<p><i>connection with the socio-economic functions of forests”</i></p> <p>An amendment to 7.4. in the forest management standard has been made to fulfil the requirement:</p> <p>PEFC DK 001-3, section 7.4:</p> <p>”Due regard to the role of forestry in rural development shall be given in the planning process, and especially new opportunities for employment in connection with the socio-economic functions of forests shall be considered taking into account the size of the forest.”</p>	

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		<p>(can be fire places, primitive campsites, forest playgrounds, vantage points, parking areas etc.).</p> <ul style="list-style-type: none"> • Areas allocated to intensive management practice. <p>f) A maintenance plan for the biodiversity areas containing at least:</p> <ul style="list-style-type: none"> • The objective with the designated area • The time horizon • Elements of concern for protection • Necessary actions for maintenance” <p>PEFC DK 001-3, section 7.1.1: “The forest management shall be structured to protect and improve the forest resources, including the ability of the forest to produce a broad variety of forest products and other services of value in the long perspective, with respect towards the different use and functions of the forest area.”</p> <p>No evidence was found that due regard is given to rural development and new employment opportunities in connection with the socio-economic functions of forests.</p>		
5.6.5 Adequate public access to forests for the	NO	PEFC DK 001-3, section 7.3.1: “Opportunities for outdoor recreation and nature experience in the forest	FORM notice that: ” No reference was found that addresses public access in	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.</p>		<p>shall be ensured by i.a. easy access, including the maintenance and establishment of roads and pathways, clearing of scenic views and possibly designation of sites of particular recreational value.”</p> <p>PEFC DK 001-3, section 7.3.2: “Information about possibilities of access and recreation in the forest shall be easily accessible for the public.”</p> <p>PEFC DK 001-3, section 7.2.7: “Rare indigenous species, including red listed₃ species, shall be protected or promoted and are not allowed to be used commercially. I 2.7.1. Registrations of natural values are in place and are considered through the management.”</p> <p>PEFC DK 001-3, section 7.2.8: “Activities impacting negatively on particularly vulnerable areas and species should be regulated. I 2.8.1. Registrations of natural values are in place and are considered through the regulation of straining activities.”</p>	<p><i>relation with the respect for ownership rights and the rights of others.”</i></p> <p>An amendment has been made to criterion 3.1 in section 7 of PEFC DK 001-3 in order to fulfil this requirement:</p> <p>3.1 Opportunities for outdoor recreation and nature experience in the forest shall be ensured by i.a. easy access, including the maintenance and establishment of roads and pathways, clearing of scenic views and possibly designation of sites of particular recreational value taking in to account the size of the forest. The planning for outdoor recreation shall be done with respect for ownership rights.</p> <p>”other people’s rights” to properties in Denmark is always secured through registration in the Land Register.</p>	

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>PEFC DK 001-3, section 7.3.2: “Information about possibilities of access and recreation in the forest shall be easily accessible for the public.”</p> <p>No reference was found that addresses public access in relation with the respect for ownership rights and the rights of others.</p>		
<p>5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.</p>	NO	<p>PEFC DK 001-3, section 7.3.6: “The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work. The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.”</p> <p>PEFC DK 001-3, section 7.3.8: “The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. Further the</p>	<p>FORM notice that:” Requirement 7.3.6 states that: <i>The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.</i> The term should makes this a voluntary requirement whereas shall is required by the PEOLG.”</p> <p>In 7.3.6 “Should” is changed to “Shall”</p>	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>employees and specialized machine operators must have access to the written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task. The owner shall in connection to this ensure that the specialized machine operator possess the competences listed in annex 2 as a minimum.”</p> <p>PEFC DK 001-3, section 7.3.9: “Other contractors and users of the forest, e.g. hunters, firewood collectors, organizers of recreational activities etc., shall have specific information about protections and designations if it is assessed that the different values are possibly to be affected by the activity.”</p> <p>Requirement 7.3.6 states that: <i>The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management. The term should makes this a voluntary requirement whereas shall is required by the PEOLG.</i></p>		
5.6.10 Forest management shall provide for effective	NO	PEFC DK 001-3, section 7.3.3: “The forest owner and his employees shall be ready to enter into a dialogue with users and the	Form notice that: ” <i>No requirement was found for mechanisms for resolving complaints and disputes</i>	<i>Although these legal possibilities for appeal may play a role in some cases, it is in the spirit of this requirement</i>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
<p>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>local community aiming i.e. at ensuring a reasonable:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Planning and exerting of recreation in the forest. <input type="checkbox"/> Utilization of knowledge about the natural and cultural history of the forest.” <p>No requirement was found for mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.</p>	<p><i>relating to forest management between forest operators and local people.”</i></p> <p>Due to § 62 in the Forest Act anyone with a significant interest in a case is entitled to complain to the Natural and Environmental Appeal Board. The Natural and Environmental Appeal Board is an independent complaints authority for administrative decisions within the plan, nature and the environment areas.</p> <p>§§ 60 – 64 in the Forest Act gives the more detailed rules for handling complaints.</p> <p>While the same possibilities for complaints are given in the Nature Protection Act (§§ 78-87).</p> <p>The possibility for complaining within the plan, nature and the environment areas is often used and decisions of the Board are used in the administration of laws.</p>	<p>that complaints and disputes are solved as much as possible at the level where they occur, i.e. between manager and local people. Including a government authority is a possible next step.</p> <p>A mechanism ‘above’ the forest management level is acceptable in case it can functionally serve the purpose of effective communication and consultation with local people and other stakeholders relating to sustainable forest management and for resolving complaints and disputes relating to forest management between forest operators and local people.</p> <p>The mechanism cited by PEFC Denmark can only serve partly to cover the requirement, because the mechanism relates to appeals regarding administrative decisions taken by the government and issues under the jurisdiction of the government. Any other issues, including private to private complaints, are not covered under the scope of</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
				the cited mechanism. Also, there is a missing link in the chain of events before arriving at an appeal. Appeals are made against formal decisions, whereas a complaint or dispute does not need to be a reaction to a formal decision. The missing link is the complaint and dispute resolution mechanism relating to forest management between forest operators and local people.
5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	NO	<p>PEFC DK 001-3, section 7.3.6: “The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work.”</p> <p>PEFC DK 001-3, section 7.3.8: “The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are carried out in compliance with the requirements for sustainable forest management. Further the employees and specialized machine operators must have access to the</p>	<p>FORM Notice that: <i>“Insufficient evidence was found of a requirement addressing that the planning, organisation and performance of forestry work shall enable risk identification and that all reasonable measures have to be applied to protect workers from work-related risks.”</i></p> <p>Denmark's Working Environment Act is very comprehensive and makes great demands on employers in relation to comply with safety and ensure healthy and safe working conditions.</p> <p>By § 1 states: § 1 The Act seeks to create</p>	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task. The owner shall in connection to this ensure that the specialized machine operator possess the competences listed in annex 2 as a minimum.”</p> <p>Insufficient evidence was found of a requirement addressing that the planning, organisation and performance of forestry work shall enable risk identification and that all reasonable measures have to be applied to protect workers from work-related risks.</p>	<p>1) a safe and healthy working environment at all times in accordance with the technical and social development in the community and</p> <p>2) the basis for the companies themselves can resolve safety and health issues with guidance from social organizations and the guidance and control of workplace exposure. (google translate)</p> <p>The law includes work for an employer see § 2 and in many cases, also when private performing work in their spare time at home (§)</p> <p>Furthermore, there is a wide range of industry guidance for agriculture published by BAR jordtilbord</p> <p>Further more an amendment to criteria 3.6 in PEFC DK 001-3 has been added:</p> <p>“The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees have the necessary skills to carry out their tasks in a safe</p>	

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
			and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work.”	
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.	NO	<p>PEFC DK 001-3, section 7.3.6: “The owner of the forest shall supervise and monitor forest management activities and shall ensure that employees carry out their tasks in a safe and qualified manner in compliance with current guidelines for forest management and relevant legislation, including legislation about health and safety at work. The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.”</p> <p>PEFC DK 001-3, section 7.3.7: “The use of pesticides, including rodenticides, shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.”</p> <p>PEFC DK 001-3, section 7.3.8: “The forest owner shall in connection with the operations ensure that the tasks performed by the employees and specialized machine operators are</p>	<p>FORM notice that:” Requirement 7.3.6 states that: <i>The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.</i> The term should makes this a voluntary requirement whereas shall is required by the PEOLG.”</p> <p>In 7.3.6 “Should” is changed to “Shall”</p>	conforms

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
		<p>carried out in compliance with the requirements for sustainable forest management. Further the employees and specialized machine operators must have access to the written documentation, including registrations of the nature, culture and recreational values, relevant for the performance of task. Beside of that, they shall always possess the knowledge relevant for the task. The owner shall in connection to this ensure that the specialized machine operator possess the competences listed in annex 2 as a minimum.”</p> <p>Requirement 7.3.6 states that: <i>The forest owner should continuously ensure that employees get the necessary supplementary training to carry out a sustainable management.</i> The term <i>should</i> makes this a voluntary requirement whereas <i>shall</i> is required by the PEOLG.</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</p>	<p>NO</p>	<p>PEFC DK 001-3, section 7.3.10: “The forest owner shall at a reasonable degree be willing to host areas and offer knowledge to research activities and data collection when approached by research institutions.”</p> <p>No evidence was found that forest management shall be based inter-alia on the results of scientific</p>	<p>FORM notices that: “No evidence was found that forest management shall be based inter-alia on the results of scientific research.”</p> <p>An amendment to 7.4. in the forest management standard has been made to fulfil the requirement:</p>	<p>conforms</p>

Question	YES / NO*	Reference to scheme documentation	PEFC Denmark – comments	FORM comments to PEFC DK response
sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.		research.	PEFC DK 001-3, section 7.4: Available knowledge and data from research institutions, forest monitoring and counseling services, as appropriate, shall be used in the planning process and the grant schemes aimed at forestry that promotes forest policies shall be considered.	
Criterion 7: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)				

If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

PART IV: MINIMUM REQUIREMENTS CHECKLIST FOR CERTIFICATION AND ACCREDITATION PROCEDURES (ANNEX 6)

2 SCOPE

This document covers requirements for certification and accreditation procedures given in Annex 6 to the PEFC Council Technical Document (*Certification and accreditation procedures*).

3 CHECKLIST

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
Certification Bodies						
3.	Does the scheme documentation require that certification body chain of custody certification against PEFC ST 2002:2010 shall fulfil requirements defined in ISO Guide 65?	Annex 6, 3.1	No	No reference to ISO Guide 65 found. No normative reference found to cover certification and accreditation procedures for chain of custody certification.	<p>PEFC Denmark formally approved the international standard "Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2012)" at their meeting on the 23rd of October and it has been incorporated in to the Danish scheme.</p> <p>PEFC DK 005-3, section 1: "For requirements for certification bodies operating PEFC chain of custody certification in Denmark according to the international</p>	Conforms referring to ISO17021

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
					<p>chain of custody standard the international requirements "Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2012)" apply."</p> <p>And in the system description section 3: "Chain of custody certification within the framework of the Danish scheme is carried out in accordance with the requirements of the international standard for Chain of custody; PEFC ST 2002:2010: Chain of custody of forest based products. The same applies to the requirements for use of PEFC logo and for requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard."</p> <p>Additional evidence was sent by e-mail on 9-11-2012</p> <p>... when using ISO 17021 the validity period for certificates is 3</p>	

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
					years. See 17021:2011 section 9.1.1.2.	
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	No	PEFC DK 005-3 chapter 5.1: "The auditors must: 1. Fulfil the general criteria, as appropriate, for environmental auditors defined in DS/EN ISO/IEC 17021:2011: Conformity assessment - Requirements for bodies providing audit and certification of management systems, and 2. Have a good understanding of the Danish scheme with regard to sustainable forest management, and 3. Have in-depth knowledge on Danish forest management and administration and the rest of the elements encompassed by PEFC Denmark's Forest Management Standard. At audits the certification body shall use a person with a professional expertise within forestry and forestry's environmental	An amendment has been added to section 6.3 in PEFC DK 005-3 in order to fulfil the requirement: "The certification body must: 4) Have technical competence in forest management on its economic, social and environmental impacts	Conforms

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
				<p>impact. This person shall have two years of practical experience with Danish forest management. Beside of that, at least one person with experience of certification procedure shall participate as well. The same person can handle both tasks.</p> <p>Note: professional expertise within forestry and about the environmental impact of forestry can be documented for personnel with a relevant education and professional experience within forestry in relation to forest management. A Master of Forestry, Forest and Landscape Engineer, Biologist, Forest technician or similar all fall within the understanding of having a relevant education.”</p> <p>These requirements apply to auditors only, not to certification bodies.</p>		
5.	Does the scheme	Annex 6, 3.1	No	No such requirement found.	Same argument as for No. 3	Conforms

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
	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?			No normative reference found to cover certification and accreditation procedures for chain of custody certification.		
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	No	PEFC DK 005-3 chapter 6.3: "The qualification criteria for the certification bodies used in certification audits of sustainable forest management and group certification of sustainable forest management, are based on the "Requirements for bodies providing audit and certification of management systems" (DS/EN ISO/IEC 17021:2011), supplemented with specified requirements from PEFC Denmark and expertise within the sector.	Same argument as for No. 3	Conforms

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
				<p>The certification body must:</p> <ol style="list-style-type: none"> 1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard, and 2. Use a documented method, according to which the forest management may be audited and certified (certification procedure), and 3. Have a good understanding of the Danish scheme, with regard to sustainable forest management. <p>CoC is not included in this requirement. No normative reference found to cover certification and accreditation procedures for chain of custody certification.</p>		

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
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	No	<p>PEFC DK 005-3 chapter 5.1: "At audits the certification body shall use a person with a professional expertise within forestry and forestry's environmental impact. This person shall have two years of practical experience with Danish forest management. Beside of that, at least one person with experience of certification procedure shall participate as well. The same person can handle both tasks."</p> <p>CoC is not included in this requirement. No normative reference found to cover certification and accreditation procedures for chain of custody certification.</p>		Conforms
Certification procedures						
12.	Does the scheme documentation require that applied certification procedures for chain of custody	Annex 6, 4	No	No reference found to ISO Guide 65. No normative reference found to cover certification and accreditation procedures for chain of custody	Same argument as for No. 3	Conforms

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
	certification against PEFC ST 2002:2010 shall fulfil or be compatible with the requirements defined in ISO Guide 65?			certification.		
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	No	<p>PEFC DK 005-3: "The certification body shall inform PEFC Denmark about all issued forest management and group certificates and changes concerning validity and scope of these certificates"</p> <p>CoC is not included in this requirement. No normative reference found to cover certification and accreditation procedures for chain of custody certification.</p>	Same argument as for No. 3	Conforms
17	Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody	Annex 6, 4	No	No reference found about the maximum assessment period or validity period of certificates. The only reference given in PEFC DK 005-3 section 6.5.7 concerns the annual	Same argument as for No. 3	Conforms

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation	PEFC Denmark comment	FORM comments to PEFC DK response
	certifications?			surveillance audits.		
Accreditation procedures						
25.	Does the scheme documentation require that certification body undertake chain of custody certification against PEFC ST 2002:2010 as "accredited certification" based on ISO Guide 65?	Annex 6, 5	No	No reference found to ISO Guide 65. No normative reference found to cover certification and accreditation procedures for chain of custody certification.	Same argument as for No. 3	Conforms

* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.

[*1] This is not an obligatory requirement

MINIMUM REQUIREMENTS CHECKLIST FOR ADMINISTRATION OF PEFC SCHEME –

COMPLAINTS AND DISPUTE PROCEDURES (PEFC GD 1004:2009)

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
Requirements for administration of PEFC Scheme – Complaints and dispute procedures						
1	Does the scheme documentation procedures for dealing with complaints relating to the	Section 8.1	No	No reference found.	In the System description section 10 is describes the procedures for Appeals,	Conforms

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
	governance and administration of the PEFC scheme?				<p>complaints and disputes:</p> <p>“Appeals, complaints and disputes relating to issuance and withdrawal of certificates shall be brought before and handled by the certification body’s own procedures.</p> <p>An appeal committee appointed by PEFC Denmark (“<i>Statutes of PEFC Denmark</i>”, §7) shall deal with other complaints and disputes arising from implementation and interpretation of the Danish scheme that cannot be addressed in the dispute settlement procedures of the relevant certification or accreditation body”</p> <p>And in the statues §7: "§7 Appeal Committee 7.1 The Board of PEFC Denmark has the overall responsibility to handle and solve disputes and complaints related to certification under the Danish scheme, which cannot be solved by the</p>	

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
					<p>certification bodies' or accreditations bodies' own procedures.</p> <p>7.2 Two distinct types of situations, where an appeal committee are needed, can arise:</p> <ul style="list-style-type: none"> - Disputes relating to the implementation of the requirements in the Danish scheme in tangible cases. - Complaints concerning the clarity and interpretation of the requirement in the Danish scheme. <p>An appeal committee shall be established if an agreement between the involved</p>	

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
					<p>parties cannot be obtained.</p> <p>7.3 An application for settlement of complaints and disputes shall be addressed in writing to the Board of PEFC Denmark together with relevant documentation. The Board assess whether the disputes and complaints fall within the two types defined in § 7.2</p> <p>7.4 An impartial appeal committee with the necessary expertise to evaluate the complaints and disputes shall be established if the conditions in § 7.3 are fulfilled. The appeal committee are established on ad hoc basis. The appeal committee shall consist of 3 members. Each part appoints 1 member. The two members</p>	

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
					<p>agree on the third member, who at the same time shall act as chairman for the appeal committee. Within one month after the appointment the appeal committee shall come up with a recommendation for a solution to the Board of PEFC Denmark.”</p>	
2a	Does the complaint procedure provide for acknowledgement of the complaint to the complainant upon receipt of the complaint?	Section 8.2a	No	No reference found.	<p>An amendment to the System descriptions section 10 for appeal, complaints and disputes” has been added in order to fulfil the requirement:</p> <p>“ Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint/dispute to the complainant. - gather and verify all necessary information to validate the complaint/dispute 	Conforms

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
					<p>- appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmarks Statutes §7)</p> <p>- Based on the recommendation from the appeal committee decide on the appeal</p> <p>Formally announce the result and information about the complaint procedure to the complainant.</p>	
2b	Does the complaint procedure provide for gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint upon receipt of the complaint?	Section 8.2b	No	No reference found.	<p>An amendment to the System descriptions section 10 for appeal, complaints and disputes” has been added in order to fulfil the requirement:</p> <p>“ Upon receipt of the complaint and disputes, the board of directors of PEFC Denmark shall:</p> <p>- acknowledge receipt of the complaint/dispute to the complainant,</p>	Conforms

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
					<ul style="list-style-type: none"> - gather and verify all necessary information to validate the complaint/dispute - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7). - Based on the recommendation from the appeal committee decide on the appeal <p>Formally announce the result and information about the complaint procedure to the complainant</p>	
2c	Does the complaint procedure provide for formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties upon receipt of the complaint?	Section 8.2c	No	No reference found.	<p>An amendment to the System descriptions section 10 for appeal, complaints and disputes" has been added in order to fulfil the requirement:</p> <p>" Upon receipt of the complaint and disputes, the board of directors of PEFC</p>	Conforms

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
					<p>Denmark shall</p> <ul style="list-style-type: none"> - acknowledge receipt of the complaint/dispute to the complainant. - gather and verify all necessary information to validate the complaint/dispute - appoint an impartial appeal committee with the necessary expertise to impartially and objectively evaluate the complaint/dispute (jf PEFC Denmark's Statutes §7). - Based on the recommendation from the appeal committee decide on the appeal <p>Formally announce the result and information about the complaint procedure to the complainant.</p>	
2d	Does the complaint procedure provide for appropriate corrective and preventive actions?	Section 8.2d	No	No reference found	<p>in the statutes §7 is stated: "§7 Appeal Committee 7.1 The Board of PEFC Denmark has the overall responsibility to handle and</p>	<p>No reference is found that PEFC Denmark will use the experience and outcomes of complaint and dispute procedures to formulate</p>

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents	PEFC Denmark comment	FORM comments to PEFC response
					solve disputes and complaints related to certification under the Danish scheme, which cannot be solved by the certification bodies' or accreditations bodies' own procedures.	appropriate corrective and preventive actions.

Annex 4: Panel of Expert comments and FORM response

Assessment of the Danish Forest Certification Scheme - Panel of Experts review of Second Interim Report

Report chapter / page	PoE member	Consultant's report statement	PoE member comment	Consultant's response
	ME		<p><u>SUMMARY OF PoE review</u></p> <p>Whilst Form has recommended that the PEFC DK scheme be re-endorsed and I would agree with that assessment, I believe that it could have been worded as conditional endorsement based on compliance of the non-conformities with the PEFC requirements within a defined period of time as none have been identified as major non-conformities which would impact on the integrity of the PEFC DK scheme.</p> <p>Based on the evidence provided for the non-conformities, my assessment of the non-conformities is: 3.3 – minor which could be amended by PEFC DK 3.4 – 5.1.6 – agree with the consultant</p>	<p>As this assessment is carried out under the guidelines for Content of the Consultant's Assessment Report for Forest Certification Schemes GLI 6/2005, the consultant is not able to tie specific follow-up decisions to minor and major non-conformities, as these are not defined in the guidelines. There is no system to indicate time frames to restore non-conformities. Such guidelines are provided in the new guiding document which has been endorsed after this assessment commenced. It is up to the PEFC and Board to decide on these issues.</p> <p>Flexibility was applied regarding the change in PEFC standards during the revision process, especially for the standard setting process. PEFC DK processes were assessed based on procedures valid at the time of commencement in 2010, which is indicated in the report.</p>

			<p>but PEFC DK could amend the standard to ensure compliance</p> <ul style="list-style-type: none">5.6.10 – as per 5.1.63.5 – as per 3.3 comment3.6 – as per 3.3 comment <p>Based on the section of GL2/2011 for the first interim report and the full GL2/2011 for the second interim report, Form has conducted a very thorough evaluation. Evidence from PEFC DK has been cited and Form’s assessment has been provided in most instances. The use of quotation and non-quotation marks in the text isn’t the best way to distinguish the PEFC DK and Form text – it may have been better to have used normal for PEFC DK and italicised text for Form.</p> <p>It would appear the Form’s first interim report was quite comprehensive in finding a variety of non-conformities at various levels within the Danish Scheme – some flexibility should have been allowed for PEFC DK being caught between changes in PEFC’s requirements in terms of the revision of the endorsed</p>	
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			<p>scheme.</p> <p>Based on my English as a 1st language, I have made many suggestions labelled as Expression for consideration by the consultant and have provided relevant text which is <u>underlined</u> for emphasis.</p> <p>There are some setting out (format) issues especially on spacing (Pg 17,19,23,24,28,44) – for presentation purposes, the format should be consistent in the manner of presenting PEFC requirements, PEFC DK text and Form comments.</p>	
Title	ME		‘Of’ should be ‘of’	changed
1-72	ME	Footer in whole document	Check the font size of ‘Denmark’!	changed
1	ME	Table of Contents	<p>Annex 1: <u>PEFC Council</u> Minimum Requirements Checklist</p> <p>Annex 2: <u>Questionnaire</u> for Public Consultation</p> <p>Annex 3: PEFC Denmark’s Comments to the <u>First</u> Interim Report</p>	changed
2	ME	Acronyms	<p>It would seem that the following are missing from the list: CR; GD; GL; GLI; PEFC; PEFC DK</p> <p>There is a ‘the’ in the full PEFC title</p>	changed

3	ME	1.INTRODUCTION 1 st para. 2 nd para.	The acronym DFCS has been used for the scheme but in many places in the report ‘Danish Scheme’ has been used which would be comparable to DFCS – wouldn’t one term be more appropriate Expression: ‘... standards were analyzed <u>against</u> another standard ...’ ‘Form <u>has</u> also carried out ...’	Wording changed, but DFCS and Danish Scheme are maintained
3	ME	1.1 Scope of the assessment	Expression: ‘The scope of this assessment is to <u>evaluate</u> the DFCS <u>against</u> the’	Original wording maintained
3	ME	1.2 Assessment process 2 nd dot point 3 rd dot point 7 th dot point 8 th dot point	PEFC <u>Denmark</u> ’s documentation Change ‘%’ to ‘per cent’ ‘ <u>To be undertaken</u> by ...’ ‘ <u>To be undertaken</u> by ...’	Partially changed
4-5	ME	1.3 Methodology adopted Dot point f)	The PEFC standards are mentioned in a), b), d) and e) but are not provided in Acronyms which is what they are for the purposes of the report Expression: ‘... the information obtained <u>from</u> and <u>in</u> correspondence with ...’	Partially changed
6	ME	1.4 Documents / resources	Expression: ‘PEFC <u>Denmark</u> ’s documents <u>that</u> Form ...’	Changed

			<p>System is used in two of the Danish documents – scheme is the more accepted word!</p> <p>The 4th document – if this is the Danish Scheme document referred to in the consultant’s report, why is ‘system’ used!!</p> <p>It is usual to have a year with an Act i.e. the year it was enacted</p> <p>If the document is in Danish, it should be qualified at the end of the document</p>	
7	ME	1.5 Personnel	<p>Expression: ‘This conformity assessment was <u>undertaken by ...</u>’</p>	changed
8	ME	2 RECOMMENDATION	<p>Noting my first comment at the start of this report, I have amended the recommendation as it currently is to more accurately reflect process in the PEFC</p> <p>Expression: ‘Based on the results of this conformity assessment, Form international recommends <u>to</u> the PEFC Board of Directors <u>that it does advise the endorsement of</u> the Danish Forest Certification Scheme <u>to the PEFC Council</u> provided the non-conformities shall be addressed within a defined</p>	The first suggestion for wording is adopted. Endorse is changed to re-endorse. FORM cannot indicate anything about timelines as explained above.

			<u>timeline as determined by the PEFC Board of Directors.</u>	
9	ME	3.1 Overall 1 st para. 3 rd para.	They must impact on the integrity of the FMS but as 2 out of 72 requirements under the PEFC's meta FMS and in view of consultant's comment, would appear to be minor and not impact on the integrity of forest management. They have not been allocated as major non-conformities and would appear to be minor using term from 3 rd paragraph. Do they affect the integrity of the scheme? Any endorsement is based on revision of PEFC DK documentation to address the non-conformity i.e. it is a condition of the endorsement to close out non-conformities	As this assessment is carried out under the guidelines for Content of the Consultant's Assessment Report for Forest Certification Schemes GLI 6/2005, the consultant is not able to tie specific follow-up decisions to minor and major non-conformities, as these are not defined in the guidelines. There is no system to indicate time frames to restore non-conformities. Such guidelines are provided in the new guiding document which has been endorsed after this assessment commenced. It is up to the PEFC and Board to decide on these issues.
9-10	ME	3.3 Group Certification procedures Consultant's conclusion	I believe it is a minor non-conformity which could be resolved by PEFC DK with minor amendments to documentation – don't agree with the conclusion by consultant	FORM also considers this as a minor non-conformity. Nonetheless, it has to be addressed by minor amendments to comply with the PEFC minimum requirements, as also indicated by PoE member.
10	ME	3.4 Forest Management Standard (FMS) 5.1.6	Text should be indented for Presentation Spelling error in PEFC DK document	The consultant has no role to play in this matter

			– summary is correct spelling!	
11	ME	Consultant’s conclusion	Agree with the first two dot point reasons from consultant. In relation to 3 rd dot point, would need the PEFC TU to adjudicate on ‘publicly available’ – I believe a request is sufficient as most small/medium owners wouldn’t have a web site and possibly even at group level!	The third bullet point was removed after discussion and agreement between FORM and PEFC TU, based on the fact that many PEFC schemes have the procedure that public summaries can be available on demand. PEFC supports this interpretation of the standard.
12	ME	3.5 Certification and Accreditation Procedures	I believe there are two conclusions for this requirement – Conforms for the CoC and as it stands for FM; having said this, the FM issue should be able to be fully resolved by PEFC DK – whilst amending the documentation, PEFC DK could provide copies of FM certificates with the period of validity to show the 5 year length for FM certificates – this provides the practice and the process can be amended	<p>Based on additional evidence provided by PEFC DK the conformity of requirement 17 was demonstrated as follows:</p> <p>PEFC DK 005-3: “The certification body must:</p> <p>1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard.”</p> <p>The maximum assessment period or validity period of forest management certificates is regulated through the ISO 17021 standard. As described in ISO 17021, section 9.1.1.2, the certification cycle may not exceed 3 years.</p> <p>For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International</p>

				standard PEFC ST 2003:2012.
12	ME	3.6 Complaints and Dispute Resolution Procedures	This FM issue should be able to be fully resolved by PEFC DK	
13	ME	4 2 nd para., last sentence 3 rd para. 4 th para. Last para.	Expression: Currently, the Danish Scheme <u>is going</u> through <u>its</u> second revision. Expression: The Danish Scheme aims to promote sustainable forest management in Denmark and <u>is based</u> on the current situation in the Danish forest sector, relevant national legislation and the <u>national scheme</u> requirements set by PEFC International. The scheme is built up out of seven normative documents, one descriptive document and two organisational documents, all of which have been considered in the current <u>conformity</u> assessment. Where is indicated ‘PEFC Denmark’ – is it really the Danish Scheme? Delete ‘following’	Partially changed
14-15	ME	4.1.2 Results	Why is req. 4.1 the same as req. 4.1a? It seems to be repeated information	
14-15	ME	Req 4.1a	Doesn't the title of DK 008-2 provide the high level conformity?	The consultant found sufficient proof to demonstrate conformity. It is possible that additional evidence can be found. This does not change the assessment outcome.
19	ME	Req 4.4 Procedures	Also see 4.1, Sect 4, DK 008-2!	The consultant found sufficient proof

				to demonstrate conformity. It is possible that additional evidence can be found. This does not change the assessment outcome.
19	ME	Req 4.4 Process	Expression Development report, Appointment of working groups: “The Board appointed the working groups at their meeting the 4th November 2010 based on nomination <u>from</u> invited stakeholders. All stakeholders interested in participating in the revision <u>were</u> included in the working group. The appointment of the working group was announced at PEFC <u>Denmark’s</u> web-page. All participants were <u>contacted</u> by e-mail.”	Wording by PEFC DK
19	ME	Req 4.4a Procedures	Also see 4.1c, Sect 5, DK 008-2!	The consultant found sufficient proof to demonstrate conformity. It is possible that additional evidence can be found. This does not change the assessment outcome.
19	ME	Req 4.4a Process	In relation to ‘...standard setting procedures to better comply with this requirement in future.’ – No, its to comply with a change in PEFC requirements which were not applicable at the start of PEFC DK scheme revision	The consultant had to assess conformity against currently valid procedures. The assessment outcome reflects the past process compliance with procedures valid at that time, while referring to currently valid procedures that also have to be taken into consideration. The assessment outcome is therefore positive with due consideration for current procedural requirements.
20-21	ME	Req 4.4b Process	Expression:	changed

		1 st para. 3 rd para.	<p>‘Development report: The list of people and organisations in the working groups is provided in Appendix 1 <u>of that report</u> and shows balanced representation covering the relevant stakeholder categories and geographical scope.’</p> <p>Expression: ‘There has been a case <u>in the development of the Standard where</u> [domination] of interests played a role: One working group member representing the Danish Forest and <u>Landscape</u> Engineers ...’ – the use of ‘domination’, maybe it is more like an entrenched viewpoint not open to compromise!</p>	
21	ME	Req 4.4c Process	<p>Expression: Development report: The list of people and organisations in the working groups is provided in Appendix 1 <u>of that report</u> and shows that at least 50 <u>per cent</u> of the members represent materially affected stakeholders.</p> <p>The PEFC DK Board decided in its 41st meeting on 4 November 2010 that the 11 stakeholder groups that applied for a position in the working group jointly represented <u>to a sufficient extent</u> the most important interest groups in Denmark. <u>The chair</u> of the working groups was <u>especially</u> selected based on impartiality, factual knowledge of the matter and process oriented qualities.</p>	Partially changed

22	ME	Req 4.5 Process	‘PEFC DK 008-2 shall be equally available on the website.’ – the consultant should only be checking for process – it is expected that with DK 008-02 replacing DK 008-01 it will be available on the PEFC DK web site	Agreed and changed
23-24	ME	Req 4.5c	Check the font size!	changed
24	ME	Req 5.1 Process 1 st para. 2 nd para., 1 st sentence	Close the quotation marks! Expression: ‘In the 40th PEFC DK board meeting of 7 September 2010 the list of organisations <u>was decided upon for invitation to participate on</u> the working groups.’	Partially changed
25	ME	Req 5.1 Process 3 rd para. 4 th para.	Change ‘judges’ to ‘confirms’ Also, the Note to the requirement provides one means of meeting the requirement – it isn’t obligatory otherwise it would have been in the requirement!	Wording changed. The consultant sees the Note as obligatory, which was also indicated during the PEFC Assessor training attended in September 2012.
25	ME	Req 5.2 Process 1 st para.	Close the quotation marks!	Changed
26	ME	Req 5.3 Process 1 st para. 3 rd para., 2 nd sentence	Close the quotation marks! Expression: ‘ <u>However</u> , the procedures have been adjusted <u>to conform to current PEFC requirements</u> and now require open invitation for participation in the working groups.’	Partially changed
27	ME	Req 5.3a Process	The weblink – was this explicit in the letter to cover the steps rather than re-iterate in the letter?	The letter explained objectives, scope and time needed. Steps were not mentioned in the letter, but a link to the procedures was included. The letter

				therefore contained the steps implicitly, but the consultant found the accessibility sufficient and in combination with the other information explicitly present in the letter that has led to a conformity decision.
27	ME	Req 5.3b Process 3 rd para., 2 nd sentence	Expression: ' <u>However</u> , the procedures have been adjusted to conform to current PEFC requirements and now require open invitation for participation in the working groups.'	Text maintained
28	ME	Req 5.3c Process 2 nd para., 2 nd sentence	See comment at Req 5.3b	Text maintained
28	ME	Req 5.3d Process 2 nd para., 2 nd sentence	See comment at Req 5.3b 'Conform' should be ' <u>Conforms</u> ' for consistency with the rest of document!	Partially changed
29	ME	Req 5.3e Process 2 nd sentence	Expression: 'Also a copy of PEFC DK 008-2 accompanied the invitation letters.'	Changed
30	ME	Req 5.4 Process 4 th para.	Change 'Meanwhile' to 'However'	changed
30	ME	Req 5.5a Process	Expression: 'Development report: <u>Table 2</u> lists working documents that <u>were</u> made available to working group members. This <u>was</u> confirmed by working group members in the stakeholder survey.'	Changed
31	ME	Req 5.5b Process	Expression: 'Development report: <u>Table 2</u> provides a list of meetings, communication and	Changed

			decisions that show that meaningful opportunities have been provided. This <u>was</u> confirmed by minutes and responses from working group members that participated in the stakeholder survey.’ Who were the communications with or between?	
31	ME	Req 5.5c Process	Expression: ‘Development report: <u>Table 2</u> provides an overview of the minutes that have been kept of the <u>working group</u> meetings. <u>A sample of the minutes</u> <u>was</u> reviewed and contained detailed accounts of discussions, resolution of varying views and decision making.	Partially changed
32	ME	Req 5.6a Process 2 nd para.	Expression: ‘The consultant confirmed <u>relevant</u> information in the web announcement, press release of the <u>open</u> seminar and invitation letters sent out to the stakeholders.’	Partially changed
32	ME	Req 5.6b Process 2 nd para.	Expression: ‘The consultant confirmed <u>relevant</u> information in the web announcement, <u>the mailed</u> invitation and press release of the <u>open</u> seminar. In Denmark, no disadvantaged stakeholders are defined <u>and key stakeholders were consulted.</u> ’ To whom were the invitations mailed out to?	Partially changed
33	ME	Req 5.6c Procedures	Wouldn’t part of DK 008-2, Sect 7 be	Sufficient evidence was found. Possibly there is more evidence

			applicable here for the enquiry draft?	applicable.
34	ME	Req 5.6f Procedures	‘summary’ for ‘summary’	Wording by PEFC DK
35	ME	Req 5.7 Procedures 2 nd sentence	PEFC DK document - ‘from’ for ‘form’	Wording by PEFC DK
35	ME	Req 5.8 box Process 1 st para.	Check font size! Doesn’t indicate consensus decision at the working group level – was it?	Changed
36	ME	Req 5.8 box	Check font size!	Changed
37	ME	Req 5.9a Process 2 nd para.	The requirement is for the final approval of the standard, not in the process to get to the final draft of the standard – this issue is with the latter!	The requirement deals with the issue of sustained opposition during the entire standard setting process, not just the final stage. This was addressed and found to be conform.
40	ME	Req 5.12 Process 2 nd para.	Expression: ‘Documents were found on the <u>PEFC DK</u> website.’	Changed
40	ME	Req 6.1 Process 1 st para. 2 nd para., 1 st sentence	Expression: ‘Development report: PEFC Denmark has carried out its second <u>scheme</u> revision.’ But they were applicable at the time PEFC DK commenced the scheme revision. PEFC changed during the scheme revision and PEFC DK responded appropriately	Text updated to: The procedures in PEFC DK 008-1 for revision did not follow those in chapter 5 in all cases, but procedures were compliant with the PEFC requirements that were valid at the start of the revision process. In the revised version PEFC DK 008-2 the requirements in chapter 5 are met.
41	ME	Req 6.4	Expression: ‘ <u>Based on Danish Scheme doc, section 11</u> , a <u>one</u> year transition period is applied.’	Changed and accepted
41	ME	4.2.1 <i>Analysis</i>	The term ‘is well in line’ – does this mean compliance or conformity with	The sentence following the cited one says: One non-conformity was identified. This is deemed to be

			the relevant PEFC requirements?	sufficiently clear regarding compliance.
43-52	ME	4.2.2 <i>Results</i>	There are a number of instances where text has jumped to the next line – it needs to be reconnected with previous line!	Changed
45	ME	Req 4.2.1a	PEFC DK document - ‘writing’ for ‘written’	PEFC DK wording
47	ME	Req 4.2.1d	Close of quotation marks!	Changed
51	ME	4.3.1 <i>Analysis</i>	Does the 1 st paragraph flow onto the statement in the 2 nd paragraph?	Yes, now connected
55	ME	4.3.2 <i>Results</i>	Under the table expression: “ <u>The list of non-conformities mentioned in the table above is provided per SFM indicator from PEFC ST 1003:2010 with an elaboration for non-conformity assessment.</u> ”	Wording changed, but in other words
55	ME	5.1.6	‘summary’ for ‘summery’	PEFC DK text
56	ME	5.1.6 Consultant’s conclusion	See comment at 3.4	The third bullet point was removed after discussion and agreement between FORM and PEFC TU, based on the fact that many PEFC schemes have the procedure that public summaries can be available on demand. PEFC supports this interpretation of the standard.
57	ME	5.6.10 Consultant’s conclusion	See comment at 3.4 Spacing required for paragraphs commencing ‘No requirement ...’ and ‘PEFC DK states ...’	No comment on the conclusion of 5.6.10 found under 3.4
57	ME	4.4 and 4.5	Use of ‘The Danish Scheme’ – this is	Changed to Danish Scheme doc and

			a generic term – what is the document as per 1.4 – is it the 4 th document? If so, full title should be used here.	this term added to the table in section 1.4 of the report
58	ME	4.6.1 <i>Analysis</i> 5 th para.	Based on the 1 st paragraph of this section i.e. ‘... have been found to comply ...’, the non-conformity is very minor and doesn’t impact on PEFC DK scheme – it seems at odds with 3.5!	<p>Based on additional evidence provided by PEFC DK the conformity of requirement 17 was demonstrated as follows:</p> <p>PEFC DK 005-3: “The certification body must:</p> <p>1. Fulfil the general criteria, as appropriate, for certification bodies defined in standard DS/EN ISO/IEC 17021:2011 and supplementary requirements defined in this standard.”</p> <p>The maximum assessment period or validity period of forest management certificates is regulated through the ISO 17021 standard. As described in ISO 17021, section 9.1.1.2, the certification cycle may not exceed 3 years.</p> <p>For certification and accreditation procedures for chain of custody certification PEFC Denmark has fully adopted the PEFC International standard PEFC ST 2003:2012.</p> <p>The text in the report is changed</p>
58	ME	4.6.2 Req 1	The reference to ‘The Danish Scheme’ – is it the 4 th document of 1.4?	Changed to Danish Scheme doc and this term added to the table in section 1.4 of the report

59	ME	Req 2	'PEFC <u>DK</u> 005-3 ... The next reference to PEFC DK 005-3 should be spaced to next line!	Changed
60	ME	Req 6	Close of quotation marks! 'Conform' should be ' <u>Conforms</u> '	Changed
61	ME	Req 12	The conclusion is incorrect as it is based on PEFC's CoC procedures – it Conforms!	Correct, this was left unchanged from the first report. Now changed.
62	ME	Req 14 and 17	The conclusions are incorrect as it is based on PEFC's CoC procedures – it Conforms!	Correct, this was left unchanged from the first report for req 14 and for req 17 new evidence was provided, see response to comment 58. Now changed.
63	ME	Req 21	Does this allow other accreditation bodies outside of the EA who are members of IAF to provide accreditation – I believe this is required by the PEFC	To our understanding the answer is yes, any IAF member is accepted.
65	ME	Req 27	Close of quotation marks! Also, wouldn't it be 'PEFC DK' for the 'PEFC Council' as this is dealing with PEFC DK scheme?	This is at the liberty of PEFC DK and does not affect conformity
66	ME	Req 27	Where is the reference to PEFC ST 2002:2010?	The reference used was part VII of the PEFC Council MRC and chapter 8 and Annex 6 of the PEFC Technical Document. PEFC ST 2002:2010 is not applicable as this document concerns chain of custody requirements, whereas here certification and accreditation are the scope of assessment.

65	ME	4.7.2 <i>Results</i> Req 1 1 st para. 2 nd para.	Is this section of the document the 'written procedures' for PEFC DK? There is no requirement for 'written procedures' but an equivalent process is used which provides the conformity	<p>The PEFC DK scheme citations are the written procedures. So in this case PEFC DK does not require written procedures, but instead presented the procedures as part of the scheme documentation. This was accepted as conformity.</p> <p>For clarification the following is added to the assessment: The cited quotations show that written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme are integrally part of the scheme documentation. Because of this no separate requirement is needed that requires written procedures, because they are already in place.</p>
67	ME	Req 2c	3.6 only indicates that 2d is non-compliant, so is this a mistake as it appears compliant based on the documentation and from GL2/2011	Corrected
68	ME	5 PUBLIC CONSULTATION 1 st para. 2 nd para.	Expression: 'The international public consultation was open between 8 Jun 2012 to 7 Aug 2012 and two comments <u>were</u> received. To review the standard setting process questionnaires <u>were</u> sent to working group members that took part in the revision process and to stakeholders that	Changed

		3 rd para.	have been invited to take part, but did not participate in the working groups. <u>The questionnaire that was used can be found in Annex 2.</u> Change ‘%’ to ‘per cent’	
69	ME	GL2/2011	Annex 1 isn't titled	Changed
71-113	ME	GL2/2011	Columns don't align!	
70	ME	LIST OF DOCUMENTS AND THEIR ABBREVIATIONS	See comment for table at page 6	
152	ME	Criterion 7	This just repeats Criterion 5 – incorrect text for Criterion!	The indicated error was not found.
154	ME	PART IV, No. 5	This Conforms in the text, so it is a Yes not a No!	Changed
163	ME	Annex II	In the Table of Contents, it is Annex 2, so it should be same in the actual Annex! Expression: ‘Questionnaires <u>were</u> sent out on 19 September 2012. The table below shows the list of questions asked.’ How long was it available to stakeholders to comment? There are two question 9s!	Changed. Respondents had more than 1 month time to respond. Invitations were sent on 19 September 2012 and the deadline for submission was 26 October 2012.
165	ME	Annex 3	The title - Annex 3: PEFC Denmark's comments <u>on</u> the <u>first</u> interim report <u>including</u> FORM <u>responses to</u> PEFC DK comments - to be correct if cross reference with 1 st paragraph of Annex.	Wording by PEFC DK

			<p>Expression: ‘PEFC Denmark received the “First Interim Report - Conformity Assessment of the revised Danish Forest Certification Scheme” on 16 October with a deadline for comments from PEFC Denmark on 31 October. FORM international has identified a number of non-conformities in the Danish Scheme in order to <u>fulfil</u> requirements from PEFC International.</p> <p>PEFC <u>Denmark’s</u> board of directors discussed the findings at their meeting on 23 October and suggested some amendments to the <u>Danish Scheme</u> documentation - especially the Forest management standard (PEFC DK 001-x) and a new set off standard setting procedures was endorsed (PEFC DK 008-2). The working groups <u>were</u> informed by mail about the amendments made by the board and <u>was provided with an opportunity</u> to send in comments if any members found the amendments to be in conflict with the consensus <u>reached</u> in the <u>working</u> group. A few comments and suggestions for wording <u>were</u></p>	
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			<p>received but there was not identified any <u>opposition to the amendments</u> and all working group members accepted the amendments.</p> <p>At the same board meeting the new <u>PEFC International standard</u> “Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2012)“ was formally adopted by the Danish board as the requirements for certification bodies <u>operating chain of custody certification against the PEFC International chain of custody standard in Denmark.</u>’</p>	
166+	ME		<p>There are numerous spelling and grammar errors in this section but no suggestions as this does not add to the review being comment on the internal process with the production of the first interim report whereas the PoE review is based on this second interim report.</p>	<p>Text in Annex 3 mainly by PEFC DK, text marked yellow by FORM</p>

Conformity Assessment of the revised Danish Forest Certification Scheme, by FORM international

Panel of Experts / Prof. Dr. Hans Köpp

The assessment is based on a deskstudy. It recommends a conditional re-endorsement (not: endorsement) of the scheme. But it recommends no time limit/deadline for resolving the non-conformities. The present scheme expires in spring 2013. Although most of the non-conformities (First Interim Report), have been changed to conformities (Second Interim Report), a face to face meeting in DK would have been helpful (NL-DK is not too far). It is not clear (for me) whether all relevant documents for the assessment were available in English. A list of participants and/or contact persons/organizations/institutes in the public consultation is missing.

The difference of group- and regional certification ought to be clarified. They are not identical (support for the assessment). The same counts for the summary of the management plan, not the certification report. PEFCC sets minimum requirements which have to be followed and do not allow exceptions. It is not clear what a "green management plan" is (I can only assume). ILO-Conventions are mentioned, but what about the other relevant ones.

It is certainly not the duty of an assessment to correct and improve the original text of a scheme (especially when quotations are being used), but the assessment should also identify formal weaknesses.

It is extremely unsatisfactory, that a revision of an existing scheme continues to keep previous mistakes uncorrected. A scheme is a document available for the general public. With too many (formal) mistakes it gives a negative image to PEFCC. As some of the PoE members have English as mother tongue I am listing only some of the necessary corrections (especially pp. 165-169) are almost not acceptable, I refuse to correct those):

FORM response:

As this assessment is carried out under the guidelines for Content of the Consultant's Assessment Report for Forest Certification Schemes GLI 6/2005, the consultant is not able to tie specific follow-up decisions to minor and major non-conformities, as these are not defined in the guidelines. There is no system to indicate time frames to restore non-conformities. Such guidelines are provided in the new guiding document which has been endorsed after this assessment commenced. It is up to the PEFCC and Board to decide on these issues.

The consultant is assigned to carry out a conformity assessment which focusses on compliance of the scheme with the minimum requirements of PEFCC. Language is not part of the scope of the assessment and therefore not addressed.

Amendment

List of figures and tables

Report chapter/page	POE member	POE member comment	FORM response
p.1,4.1 and 4.2	KOE	<u>Procedure/s</u> 4.6 and 4.7 <u>procedures</u>	Changed
p.10	“	A <u>summary</u>	Wording by PEFC DK
p.19	“	<u>f</u> rom invited at...	Wording in req 4.4 Process by PEFC DK
p.24	“	Last but one line: delete on	Changed
p.29, first word	“	<u>conforms</u>	Changed
p.31, last chapter	“	...shall be <u>reached</u>	Changed
p.34 first chapter	“	...consultation were (not: was)	Wording by PEFC DK
p.34 second chapter	“	Change was to were	Wording by PEFC DK
p.34 second chapter	“	<u>a</u> mail back (not at)	Wording by PEFC DK
p.35 first chapter	“	... <u>into</u> the final	Wording by PEFC DK
p.35 Process	“	...standard have not.pilot <u>tests</u> (or: testing)	Wording by PEFC DK
p.35 bottom text	“	Change was to were (2x)	Wording by PEFC DK
p.39		Board and Board (why?)	
p.55, centre		A <u>summary</u> (2x)	Wording by PEFC DK
p.58, 4.6.1		...incorporated <u>into</u> the	Wording by PEFC DK
p.60		<u>conforms</u>	Changed
p.79		In the EU it is not possible to accept only the Danish education	
p.93 bottom/right		...shall be reached	Wording by PEFC DK

Report chapter/page	POE member	POE member comment	FORM response
p.96	KOE	change was to were (4x)	Wording by PEFC DK
p.96	“	got a mail back	Wording by PEFC DK
p.96	“	...informed (instead of: told)	Wording by PEFC DK
p.97 top box/right	“	pilot tests (or: testing)	Wording by PEFC DK
p.97 centre	“	<u>were</u> still not...	Wording by PEFC DK
p.97 centre	“	<u>a</u> suggestion for <u>a</u> new text	Wording by PEFC DK
p.103	“	...by <u>a</u> simple majority	Wording by PEFC DK
p.120	“	a summa <u>r</u> y (2x)	Wording by PEFC DK
p.133 top/right	“	...drawing <u>or</u> a true...	Wording by PEFC DK
p.167	“	FORM (instead of FROM)	Wording by PEFC DK
p.167 last line	“	... these <u>two</u> terms	Wording by PEFC DK

And many more corrections needed (see above: 165-169)

I agree with FORM's recommendation, but find many chapters of the DK scheme rather vague.

Prof. Dr. Hans Köpp

Assessment of the Danish Forest Certification Scheme - Panel of Experts review: Stefan Czamutdzian

Report chapter / page	PoE member	Consultant's report statement	PoE member comment	Consultant's response
1.2 / p. 4	Cz	„Review of interim report PEFC annex 3. „	For me this explanation is not sufficient to understand the whole process which took place after the interim report (new documents from PEFC Denmark, old ones referring to previous requirements, ...). Without a more detailed description (short summary of Annex 3) it is hard to follow the report.	The text is extended a little bit with more reference to changed documents in section 1.4. It is a deliberate choice not to include a report on the details of the revision process. There is already much information in the report and including details of revision steps and comparison of first and second versions of standards would miss its aim. The necessary details can be found in annex 3 for who is interested to know more.
1.4 / p.6.	Cz	„revoct“ (this is mentioned with 5 documents of PEFC Denmark)	Which documents in terms of validity were used? The reader has the impression that the results of the report refer to the final versions. Unclear without further explanation (see above) especially when comparing with listing on p. 70 where only one document is „revoct“.	The valid documents are the updated versions indicated with 'revoct'. The table in annex 1 is updated to include revoct indications where applicable.
3.4 / p. 12	Cz	„The mechanisms cited can only serve partly to cover the requirement, Does not conform.“	Not quite clear why this requirement does <u>not</u> conform (instead of „partly conform“) although it is stated that it „can serve partly to cover“. See also p. 149-150.	The requirement is not met. A balanced decision was made that took into consideration a partially conform mechanism. However, in essence FORM cannot confirm conformity, as explained in the report.
p. 19	Cz	Requirement 4.4 – Process „.... based on nomination <u>form</u> invited	Should read „ <u>from</u> “	Wording by PEFC DK

		...“		
p. 21 / p. 79	Cz	Requirement 4.4b – Process „This stakeholder group did not compliant with procedures.“	The reader might get the impression that this requirement does <u>not</u> conform. Therefore it should be explained more clearly why it is fulfilled. Who is „the stakeholder group“ in this context – this term is not mentioned before. On p. 37 and 101 respectively the explanation is clearer although also „the stakeholder group“ is mentioned.	The text is adjusted to clarify the situation.
p. 31	Cz	Requirement 5.5 b „- all members and“	No full sentence (ends with „and“)	‘And’ is removed
p. 32	Cz	Requirement 5.6. b – Procedures „... key stakeholders shall be <u>reach</u> through the way of communication“	Should read „ <u>reached</u> “	Wording by PEFC DK
p. 46	Cz	Req. 4.2.1c „It shall be the company“	What is „the company“ in this context – unclear to reader.	With the company the group leader is meant. This is added to the report and annex 1
p. 61	Cz	Req. 12 „Does not conform“	Why does this requirement not conform? No explanation is given and this non conformity is not mentioned in the summary in the beginning (chapter 3).	Changed, is conform and was not corrected after the first interim report
p. 62	Cz	Req. 14 „Does not conform“	Why does this requirement not conform? No explanation is given and this non conformity is not mentioned in the summary in the beginning	Changed, is conform and was not corrected after the first interim report

			(chapter 3).	
p. 67	Cz	Req. 2c „Does not conform“	Why does this requirement not conform? No explanation is given and this non conformity is not mentioned in the summary in the beginning (chapter 3).	Changed, is conform and was not corrected after the first interim report
p. 125	Cz	Question 5.1.11: last sentence: „This minority percentage requirement“.	I do not understand the meaning of this sentence.	Text changed to: By law (DFA), it is allowed to develop 10% of a managed area as non-forest nature types. This legal requirement contributes to PEFC DK compliance with part b of the PEFC minimum requirement.
p. 145	Cz	Question 5.6.1: last para: „No evidence was found of forests.“	Why does this requirement conform although no evidence was found in this point?	The last paragraph is removed, as the requirement was added to the final (revoc) version of the standard PEFC DK 001-3, section 7.4. This section is quoted in the conformity assessment
p. 154	Cz	Question No. 5 „No“	Why does this requirement not conform? No explanation is given and this non conformity is not mentioned in the summary in the beginning (chapter 3).	Changed to Yes, was not corrected after the first interim report

18.12.2012 / Cz