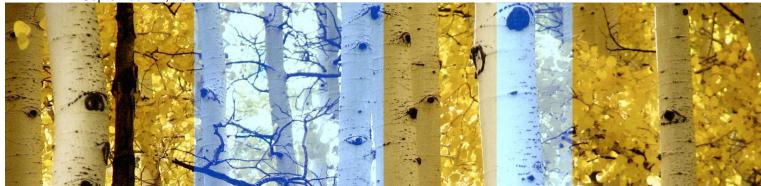


PEFC Council

Conformity Assessment of the Russian Forest Certification System with PEFC Requirements

Final Report

Helsinki, Finland September 22, 2015 7357 ID 77271





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ABBREVIATIONS

CoC	Chain-of-Custody
ENGO	Environmental Non-Governmental Organization
FCR	Forest Certification System
FSC	Forest Stewardship Council
IAF	International Accreditation Forum
ILO	International Labor Organization
ISO	International Organization for Standardization
MLA	Multilateral Agreement
NC	Non-conformity
NGO	non-governmental organization
PEFC	Programme for the Endorsement of Forest Certification Schemes
PEFCC	PEFC Council
PEFC IGD	PEFC International Guidance Document
PEFC ST	PEFC Standard
RNFCC	Russian National Forest Certification Council
STC-IS	The Scientific Technical Centre on Industrial Safety
WHO	World Health Organization
VNIILM	Russian Research institute for Silviculture and Mechanization of Forestry



PREFACE

This report provides an independent conformity assessment on the revision of the Russian Forest Certification System (FCR) with the requirements of PEFC Council. The report is prepared to provide information for the Board of the PEFCC for its decision on the potential endorsement of Russian FCR.

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

CLIENT

Name	PEFC Council
Contact person	Mr M Berger and Mr J Vlieger
Address	Case Postale 636 CH-1215 Genève 15 Switzerland
Telephone	+41 22 799 45 40
Email Website	michael.berger@pefc.org www.pefc.org

INDUFOR OY

Contact person	Ms Hanna Nikinmaa
Address	Töölönkatu 11 A 00100 Helsinki 10 Finland
Telephone	+358 40 900 16 94
Email	hanna.nikinmaa@indufor.fi
Website	www.indufor.fi



1. INTRODUCTION

1.1 Objective and Scope of the Assessment National Voluntary Forest Certification System

The Russian National Voluntary Forest Certification System (FCR System) was first endorsed by the PEFC Council in 2009. The FCR System is governed by the non-commercial partnership "Centre for Development of Forest Certification" – PEFC Russia.

The objective of this assignment is to assess the compliance of the revised FCR System revision and standard setting procedures, as well as the System implementation and performance requirements for forest management and chain of custody. The assessment report will provide sufficient information as well as professional and objective conclusions on the compliance of different System elements, which will provide a basis for the decision-making process of the PEFCC.

1.2 Background

The Centre did the FCR System periodic revision and updating of the FCR requirements to comply with the updated PEFC Council standards and regulations in 2012-2013 for Development of Forest Certification. The PEFC Russia submitted its application for the reendorsement to the PEFC Council in January 2014.

The assessment was interrupted in December 2014 to allow the PEFC Russia an opportunity to clarify and update the System documentation, specifically standard setting and group certification procedures as well as notification requirements. The revised FCR System documentation dated for the year 2015 were submitted on March 30, 2015 and amended with three revised System documents with minor corrections on August 7, 2015.

The assessment was complex due to the revision of procedural documents and of the fact that any gaps in compliance in stakeholder engagement or information sharing and recording in standard setting could not be corrected.

Due to the complex situation where the revised FCR System operationally was aligned with PEFC requirements, but standard setting process did not fully comply, and written standard setting procedures were conflicting with non-conformities, before the document revisions made during the assessment with the approval of PEFC Council, the consultant decided to apply

- i. the latest FCR System documents as in force in August 2015 as the evidence for conclusions related to procedural PEFC requirements, and
- ii. other relevant evidence to draw conclusions on compliance of standard setting process implemented.

Justification for such decision is that irreversible gaps in compliance during standard setting, should not hinder the implementation of a complying forest certification scheme. This decision is backed with the notion that stakeholders contacted or otherwise informed on the FCR review process did not raise major concerns on the validity of the standard revision process.

1.3 Assessment Process

The assessment process included the following phases:

1. International public consultation

The international public consultation organized by the PEFC Council was held in March–May 2014. No comments were received during the consultation.

2. National consultation of interested parties



Indufor sent out a questionnaire on standard setting process to 29 parties that were contacted by the PEFC Russia during standard revision, as well as to other relevant interest groups. Indufor identified the stakeholders for the consultation, because the stakeholder contact list was not made available at the time of initiation of the assessment. The objective of the consultation was to verify if the planned standard revision procedures were implemented and the principles of open access, fair decision making, consensus building and availability of grievance procedures were respected.

The questionnaire was sent out September 2014. A summary of replies is presented in Tables 7.1 and 7.2.

3. Desk study

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

4. Elaboration of draft report

The Draft report was sent to the PEFC Council on November 17, 2014 prior to the interruption of the assessment process.

5. Interruption of the assessment

Due to conflicting FCR System documentation, especially in standard setting, the assessment was interrupted until the end of March, 2015. PEFC Russia submitted partly revised System documents by the end of the interruption and amended the documentation still in August, 2015.

6. Elaboration of the final draft report

A first version of the final draft report checklist was reported in April 29, 2015 with a number of open non-conformities. PEFC Russia considered the result and provided amended documents on August 7, 2015.

This final draft report is based on the updated documents of March 2015 and August 2015, but in standard setting procedures also documents applicable in 2013 - 2014, at the time of the standard setting, were taken into consideration. Also the comments received in international and national consultation processes were taken into consideration.

The final draft report was sent to the PEFC Council on September 2, 2015, and the PEFC Council submitted it further to the PEFC Panel of Experts for review.

7. Review of the Panel of Experts

The three members of the Panel of Experts reviewed the final draft report. Their comments to the report with the consultant's considerations in the final report are presented in Appendix 4.

8. Elaboration of the final report

The final report reflects the comments of the Panel of Experts, which Indufor, in the role of independent assessor, took into consideration as it deemed appropriate. The Appendix 4 gives justifications for the consideration of each one of the comments received from the Panel of Experts.



1.4 Report Structure

- Chapter 2 states the consultant's recommendation to PEFC Council for the endorsement decision and lists the major non-conformities that justify the recommendation.
- Chapter 3 gives a summary of findings covering all elements of PEFC conformity assessment.
- Chapter 4 describes the material and methods used in the assessment.
- Chapter 5 describes the FCR System including System administration, potential applicants, implementation arrangements and revision.
- Chapter 6 gives a report on conformity analysis presented in detail in Appendix 1.
 - Section 6.1 reports on standard revision procedures and implemented process
 - Section 6.2 reports on group certification arrangements
 - \circ $\;$ Section 6.3 reports on the conformity of forest management standard
 - Section 6.4 reports on the chain of custody standard
 - \circ $\,$ Section 6.5 reports on rules for logo licensing and use
 - Section 6.6 reports on certification and accreditation requirements including provisions for notification of certification bodies
- Chapter 7 presents the stakeholder views collected during consultations.

Appendix 1 describes in detail the FCR System compliance with individual PEFC requirements summarized in the main report.

Appendix 2 Stakeholder questionnaire lists the questions on standard setting process sent to the 29 stakeholders representing parties i) involved in standard revision process and ii) other key environmental organisations in Russia.

Appendix 3 List of stakeholders contacted and requested to reply to the questionnaire described above.

Appendix 4 Panels of expert comments describes in detail the comments given and consultant's response to the comments.



2. RECOMMENDATION

Indufor recommends that PEFCC re-endorses the Russian National Voluntary Forest Certification System.

Supporting comments:

FCR System elements on requirements for forest management or chain of custody, group certification arrangements as well as certification and accreditation procedures comply with PEFC requirements. The gaps in compliance relate to earlier procedures on stakeholder invitation and establishment of a representative working group for standard revision, as well as in a minor scale to written procedures on information sharing in the working group.

The FCR System written procedures valid in 2015 are the basis of the assessment of e.g., FCR standard revision requirement, despite of the fact that the revision took place in 2012-2014. The implemented process is assessed against all evidence made available by August 2015.

The FCR System has non-conformities, classified as minor, on standard setting <u>process</u> and on procedure that should be addressed and corrected for the following revision cycle:

- Stakeholder engagement did not address the possible constraints disadvantaged stakeholders may have in participation in standard setting (Appendix 1, 5.2 Process).
- Invitation to standard revision lacked i) the clear information on stakeholders' role in drafting of the standard in the early stage of the revision and (ii) a comprehensive schedule on the planned standard revision procedures (Appendix 1, 5.3 b,c,d Process).
- Standard revision working group should still improve its procedures (2013) with a specific requirement on transparent information sharing, as well as include thorough description of decision-making procedures and related consideration of different views within the stakeholder working group (Appendix 1 5.5 a, c Procedure).

A number of comments on FCR System documentation relate to text formulations that are copied directly from PEFC Council Technical Documentation without proper adaptations to the national context.



3. SUMMARY OF THE FINDINGS

3.1 General System Structure

The PEFC Russia that is a small organisation with limited resources manages Russian FCR System. The System structure respects the PEFC requirements on independent participatory standard setting and accredited impartial certification (Figure 5.1).

An ad hoc stakeholder-working group shall develop Forest management standard. Applicants to forest certification are companies or other entities that have a lease/tenure right to the forests. In addition, group certification is possible at group or regional levels (area of an administrative unit of a lesnichestvo).

Certification bodies shall comply with relevant ISO standards and carry out certification as accredited activity. The documentation of January 2015 state that national accreditation bodies that are members of International Accreditation Forum (IAF) shall accredit certification bodies doing forest management certification, and in chain of custody certification, they shall be signatories to IAF Multilateral Agreement (amendment of 2015).

3.2 Standard Setting Procedures and Process

Two partly conflicting documents guided standard setting in 2013-2014. However, after the interruption PEFC Russia presented new set of standard setting procedures that comply with the PEFC requirements. Thus, current System procedures for standard setting (March 2015) comply with PEFC requirements despite of the minor non-conformities identified in standard setting.

The FCR revision process started on January 1, 2012 with PEFC Russia posting a notification about the initiation to the standard revision process. Public consultation was made in summer 2013 and a second technical consultation in November 2013. The revised standard of forest use and management came into force in 1 January 2014 but in January 2015 and consequently in August 2015 it was updated with mostly technical amendments. Opening and conduct of the revision process was informed in Internet and in a few regional seminars.

The Working Group including six members representing the forest industry, civil and research organizations coordinated the standard revision. In addition to that, some contribution to the process has been received from representatives of academia and scientific organizations. Despite a long list of identified stakeholders (188) to whom PEFC Russia has sent an invitation, the working group was quite small. Some environmental organisations were specifically contacted during standard consultation but they were not engaged in drafting of the basic standard requirements. Stakeholders were, in general, engaged for commenting of the prepared drafts and the small group decided how to consider the comments.

Documentation and recording of standard revision process needs to be improved, e.g. information on decisions made on stakeholder meetings are not available. Information regarding consultation and consideration of comments received is recorded.

In addition stakeholder engagement in general and especially that of disadvantaged stakeholder groups require improved process with better rate of participation in decision making on standard.

Standard revision process and procedures do not fully comply with PEFC requirements

3.3 Forest Management Standard

PEFC Russia Forest Management Standard (document 6) sets requirements that cover all six principles for sustainable management of forests. The requirements comply with the PEFC ST



1003:2010 and can be implemented at the level of a forest management unit and they are auditable.

The standard <u>complies</u> with PEFC requirements.

3.4 Group Certification Arrangements

The System regulations (document 1) and Membership commitment (document 5) set out the rules for group certification. The System has options for certification of a group of forest managers on any geographic area (joint certification) or within an area of a lesnichestvo (territorial certification). In the latter case, the state administrative unit is the applicant.

Rights and responsibilities of members and group entities are defined in line with PEFC requirements in joint certification and a reference is made for the same rules and obligations to apply to the territorial certification.

The System requirements for group certification <u>comply</u> with PEFC requirements in territorial certification.

3.5 Chain of Custody Standard

PEFC Russia has adopted the PEFC ST 2002:2013 as the chain of custody standard and certification bodies issuing chain of custody certificates shall comply with international PEFC ST 2003:2012.

Requirements for chain of custody certification <u>comply</u> with PEFC requirements.

3.6 Logo Usage Rules

Rules for logo licensing and logo usage rules (document 10), conform to PEFC requirements. In addition, certification bodies are responsible for control of the logo use (documents 7 and 8).

Logo usage rules <u>comply</u> with PEFC requirements.

3.7 Complaints and Dispute Resolution Procedures

PEFC Russia has the responsibility to convene an independent board to address formal appeals on standard setting, System implementation or interpretation of standard requirements. Appeals procedures describe the details (document 4).

Appeals procedures <u>comply</u> with PEFC requirements.

3.8 Certification and Accreditation Procedures

The certification bodies eligible to do certification against forest management and chain of custody standards shall have an accreditation to the respective certifications under relevant ISO standards (management system and product certification standards) (System description; document 1).

Accreditation bodies shall be members of International Accreditation Forum and issue accreditation in line with relevant ISO standard. Accreditation is not restricted to the Russian national accreditation body that was the case in earlier notification requirements for forest management certification. In chain of custody certification, accreditation bodies shall also be signatories to IAF Multilateral Agreement where accreditation bodies commit among other to peer reviews. This requirement is stated in PEFC ST 2003:2012 on certification bodies doing chain of custody certification.

Certification and accreditation procedures <u>comply</u> with PEFC requirements.



3.9 Notification of Certification Bodies

The System requires notification of certification bodies doing forest management and chain of custody certification (documents 7 and 8). Notification shall be impartial and assure that certification bodies comply with the requirements of the System.

Notification requirements for forest management and chain of custody certification <u>comply</u> with PEFC requirements.



4. MATERIAL AND METHODS

4.1 Russian FCR Documentation

The conformity assessment of the Russian Forest Certification system is based on the following System documentation, mostly submitted in March 2015 (Table 4.2). Earlier documentation (Table 4.Table 4.1) is referred to e.g. in standard setting requirements where it is important to understand the rules applied during the actual standard setting.

No	Name of the Document (March 2015)	Document in force in 2013-2014	Abbreviation of the document name
1	PEFC Russia System Regulation.2015	FCR system regulation (2014)	System regulations
2	Rules and Programme for PEFC Russia Standards Setting, Review and Approval. 2015	Rules and Program for Standard Development and Approval (Annex 13) (Feb. 2014)	Standard setting rules
		Statutes of Stakeholders Forum on Standard Development (Annex 4)	
S	Regulations on the Working Group for Consideration, Review, and Adoption of Forest Management Standard of Voluntary Forest Certification System of PEFC Russia. 2015	n/a	Working Group regulations
4	Regulation of Appeals Commission of PEFC Russia System. 2015	Regulations on Appeals Commission (Annex 3) (2014)	Appeals procedures
5	Declaration of Membership in PEFC Group Certification System. 2015	Declaration of membership to regional PEFC certification (Annex 9)	Membership commitment
6	PEFC Russia Forest Management Standard. 2015	Forest Management and Use Standard PEFC-FCR-ST-01-2014 (Annex 10) (2014)	FM Standard
7	Guidelines for notification of certification bodies operating PEFC forest management certification in the Russian Federation against the PEFC-endorsed national certification system. ND-001 2015	Guidelines for notification of certification bodies operating PEFC forest management certification in the Russian Federation against the PEFC-endorsed national certification system. ND-001 – 2012	FM notification ND- 001
8	Guidelines for Notification of Certification Bodies Carrying Out PEFC Chain of Custody in the Russian Federation Against the PEFC Endorsed Certification System PEFC Russia. ND-002 2015	Guidelines for notification of certification bodies operating PEFC chain-of-custody certification in the Russian Federation against the PEFC-endorsed national certification system. ND-002 – 2013	CoC notification ND- 002
9	PEFC Russia has adopted the PEFC ST 2002:2013 (Chain of Custody of Forest Based Products - Requirements) in PEFC Russia system for chain of custody certification. (Resolution of PEFC Russia General Meeting). Date not available.	PEFC ST 2002:2013	PEFC ST 2002:2013
10	Annex 14 PEFC-FCR-2014 Guide Issuance of PEFC Logo Use Licenses by PEFC Russia	same document	Logo licensing guide
11	PEFC Logo Usage Rules – Requirements PEFC ST 2001-2008	PEFC ST 2001-2008	

The FCR System revised documents are listed below:



Table 4.2Documents updated during interruption of the assessment in summer
2015

No	Name of the Document (August 2015)	Name of the Document (March 2015)	Abbreviation of the document name
1	PEFC Russia System Regulation.2015	PEFC Russia System Regulation.2015	System regulations
6	PEFC Russia Forest Management Standard. 2015	PEFC Russia Forest Management Standard. 2015	FM Standard
8	Guidelines for Notification of Certification Bodies Carrying Out PEFC Chain of Custody in the Russian Federation Against the PEFC Endorsed Certification System PEFC Russia. ND-002 2015	Guidelines for Notification of Certification Bodies Carrying Out PEFC Chain of Custody in the Russian Federation Against the PEFC Endorsed Certification System PEFC Russia. ND-002 2015	CoC notification ND- 002

The descriptive and guiding FCR System documents are listed in Table 4.3.

Table 4.3Descriptive and other documents

No	Name of the Document (August 2015)	Document in force in 2013-2014	Abbreviation of the document name
12	Order No. 29 of Centre for Development of Forest Certification – working group for standard updating – 2012 (Annex 5) (Oct 2012)	same document	Working group members
13	Annex 5 List of identified stakeholders	same document	Appendix 5 stakeholder list
14	Annex 4 Questionnaire replies (domestic survey). Stakeholder replies (Russia)	same document	Stakeholder replies (Russia)
15	Annex 6 Chronology of standard setting (provided by PEFC Russia)	PEFC Russia System development process – 2013 (Annex 1) (Nov 2013)	Standard setting process
16	Consideration of comments received in public consultation of January 2015		Consideration of stakeholder comments
Othe	er documents		•
17	Applicant's PEFC Standard and System Requirement Checklist PEFC IGD 1007-01:2012 (Annex 6)		
18	Summary of remarks to standard proposal (Annexes 7-8) (25-26 Oct 2013 respectively)		

4.2 **PEFC Documentation**

The conformity of the FCR System requirements and implemented revision processes are assessed against the following PEFC standards:

Standard Setting

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

Forest Management and Chain of Custody Requirements

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

Implementation of Certification

4. PEFC ST 1002:2010, Group Forest Management Certification - Requirements



5. Procedures for complaints and dispute resolution: PEFC GD1004:2009, Administration of PEFC scheme, chapter 8

Requirements for Certification Bodies

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

PEFC Logo Usage

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

Other Documentation

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

The *PEFC Standard and System Requirement Checklist* (PEFC IGD 1007-01:2012) will provide a template for detailed assessment of conformity to specific PEFC requirements. In addition, a stakeholder survey is made to check the participatory elements and stakeholder views on revision process and forest management standard.

4.3 Methods

The assessment is done as a desk study based on the documentation listed above, on the feedback received from the stakeholders and on the additional clarification provided by the PEFC-Russia. Indufor sent questionnaires to five members of the standard setting working group and four other active participants and a few other stakeholders in order get a broader evidence on the participatory approach in standard setting process. Altogether six answers were received. The questionnaire is presented in Appendix 2 and summary of replies in Table 7.1.

This assessment presents the conclusion on the conformity to PEFC requirements based on the available evidence. Conformity to the PEFC requirements would assure that the System is developed in line with PEFC requirements and that it will operate in a consistent and reliable way. The assessment covers System development and provisions for System implementation as described in Table 4.4.



Element	Core issues
Standard setting	 Stakeholder participation Transparency Consensus building Consistency in planned procedures and in their implementation
Criteria for forest management (standard)	 Performance requirements Practical applicability of the criteria considering natural conditions, forest tenure, organisational and administrative structures Auditability of compliance with the criteria
Certification arrangements (group, individual and regional)	 Applicability and governance of planned arrangements Reliability of arrangements to deliver full conformance to the scheme requirements Methods to indicate certification status
Requirements for chain of custody certification and logo use	 Compatibility of the requirements with PEFC CoC standard Rules for issuance and control of PEFC logo use within the scheme Risks for unjustified use e.g., during transition of national certification to PEFC certification
Certification and accreditation procedures	 Requirements set for certification bodies and procedures: competence requirements, independence and impartiality Applied procedures Access for CBs to enter into the market Compliance of scheme provisions with PEFC requirements Availability of eligible accreditation body to provide the service

Table 4.4 Assessed Elements and Core Issues

The results and conclusions of the conformity analysis are presented in detail in the assessment of the FCR System against each requirement of PEFC Council Checklist (Appendix 1). For standard setting, the assessment includes separate conclusions for procedures and applied processes, i.e. rules for standard setting and the processes implemented in standard setting in practice.

The following grading of conformity levels was used in the assessment (Box 4.1).



Box 4.1 Assessment Scales Used in Conformity Evaluation

Conformity

A procedure described by the Scheme documentation fully meets the particular requirement of PEFC Council

Minor non-conformity

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

Major non-conformity

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

NA Not applicable.

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

PEFC requirements were classified as not applicable e.g., if they address a System development phase that is not relevant for the Russian FCR (i.e., requirements for System revision or dispute resolution process in the case where no disputes have been raised to implement the planned procedures).

When Russian normative standard includes requirements directly copied from international PEFC Council regulation, a comment is raised if the copied text is not explicit in its requirement. PEFC Council recommends that national schemes would adapt the general requirements into national context with necessary specifications.

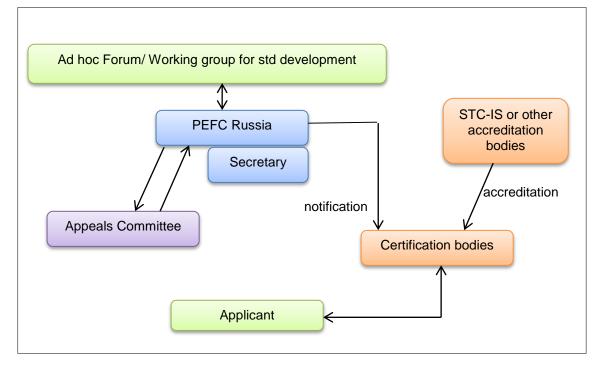


5. STRUCTURE OF THE RUSSIAN FOREST CERTIFICATION SYSTEM

5.1 System Governance

Russian National Forest Certification Council (RNFCC) developed Russian National Voluntary Forest Certification System (FCR) in 2004 – 2006. The FCR System was registered by the Federal Agency for Technical Regulation and Meteorology in 2006 and received the first PEFC endorsement in March 2009. In 2010, the RNFCC delegated the System management to non-commercial partnership called Centre for Development of Forest Certification. In October 2013, the Centre was officially renamed to PEFC Russia. PEFC Russia is the PEFC governing body for the FCR System (Figure 5.1).

Figure 5.1 Structure of FCR System



5.2 Organizations in Accreditation and Certification

The notification requirements ND-001 of June 2013 required that FCR System recognizes only the certification bodies for forest management certification that have an accreditation of a Russian national accreditation body that is a member of International Accreditation Forum (IAF). The Scientific Technical Centre on Industrial Safety (STC-IS) the only body in the Russian Federation that meets this requirement. However, it has not signed the IAF Multilateral Agreement (MLA) that assures the commitment to internationally agreed accreditation procedures and to regular peer reviews.

After the assessment interruption the updated notification requirement of ND 001-2 of January 2015 does not restrict the accreditation to a Russian accreditation body, but recognize accreditations issued by any accreditation body that is a member of IAF. This option is relevant e.g. to organizations that cooperate with international certification bodies that operate under foreign accreditation in Russia. In August 2015, the notification requirements for chain of custody certification (ND 002) were updated to require that accreditation bodies should be signatories to MLA.



In 2014, PEFC Russia for forest management certification and 28 international and national certification bodies for chain of custody certification notified five certification bodies.

5.3 Applicants

The applicants for individual certification are industrial forest companies that lease specific forest areas for a longer or shorter time.

The FCR System still applies the concept of regional certification that is combined with the concept of group certification in international PEFC documentation. The applicant in regional certification is the state forest entity lesnichestvo that is the state forest planning entity for specific forest regions. The other participants in such regional/group certifications are forestland leasing companies, enterprises, or individuals.

In chain of custody certification applicants are typically individual forest industry, harvesting, woodworking and trading companies.

5.4 Standard Setting and Revision Procedures

The standard revision was organized by PEFC Russia who was responsible for calling upon a working group and on informing stakeholders about the process through different media and seminars. The revision process was initiated via a stakeholder notification of the process on the PEFC Russia's website on January 1, 2012.

During the standard revision in 2013 – 2014, the FCR System documentation required that PEFC Russia shall initiate standard revision and that a working group shall develop the standard. However, the documentation was inconsistent in defining the rules and mandate of such working group.

The updated rules for standard setting, review and approval (Document 2 of 2015) follow closely PEFC requirements often by word, with very limited specifications for national adaptation.

Standard Setting Working Group

The FCR System defined in 2013-2014 the standard setting working group in two different documents, i.e. *Rules for Standard Development* (Annex 13 to application) and *Forum Statutes* (Annex 4 to application). The *Forum Statutes* required a balanced stakeholder-working group that is accessible to any stakeholder group and it gives the Forum a mandate to decide on the content of the standard in line with PEFC requirements. The *Rules for Standard Development* also require a working group but gives the Forum a role only in the consultation. In principle, both documents require stakeholder participation in standard setting. This confusion on the requirements led to the request to clarify the documentation during the interruption period of the assessment.

In current documentation the Document 3 of 2015 - Regulations on the Working Group for Consideration, Review, and Adoption of Forest Management Standard of Voluntary Forest Certification System of PEFC Russia. 2015 - defines the rules and mandate for the stakeholder-working group.



6. CONFORMITY ANALYSIS

6.1 Revision of Forest Management Standard

The conformance to standard setting procedures are assessed against the documents updated in March and August 2015. The standard setting process implemented in 2013-2014 is assessed based on the available evidence from that period. The possible discrepancy between implemented process and current rule is accepted if it still conforms to the PEFC Council requirement stated in PEFC ST 1001:2010.

The detailed evidence on conformity with extracts from the documents referred to below is presented in PEFC Checklist in Appendix 1.

6.1.1 Standardising Body

PEFC ST 1001:2010

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 and for formal adoption of the standard

- b) record keeping procedures
- c) the procedures for balanced representation of stakeholders
- d) standard-setting process
- e) the mechanisms for reaching consensus

f) revision of standards/normative documents

• PEFC Russia System Regulation (document 1), standard setting rules (document 2) and working group regulations (document 3) set **conforming regulations** to standardizing body and its written procedures.

PEFC ST 1001:2010

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

 The System regulations (document 1) require PEFC Russia to initiate periodic revision of the standard and Standard setting rules (document 2) require publishing of the revision process in Internet and/or mass media.

• The procedure <u>complies</u> with PEFC requirements

Process

- PEFC Russia informed on standard setting on its Internet site in 2012 and in selected seminars in different parts of the country in 2012 and 2013.
- Stakeholders were not actively invited to comment on standard setting rules (valid at that time) and the result of the planned process was so that no procedural comments were received.
- The standard setting rules were reviewed during the assessment in March 2015.
- The process complies with PEFC requirements



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.

Procedure

- Standard setting rules (document 2) require record keeping for five years
- The procedure <u>complies</u> with PEFC requirements

Process

- PEFC Russia has records on received comments and short minutes (protocols) of selected working group meetings (note five members). Draft standard versions were also available in Internet as recorded by interviewed stakeholders (see Table 7.1and 7.2).
- The process complies with PEFC requirements

4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.

The working group/committee shall: a) be accessible to materially and directly affected stakeholders; 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 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

Procedure

- Standard setting rules (document 1) oblige PEFC Russia to establish a temporary working group for each standard revision.
- Balanced participation of different interests is aimed at. Working group regulations (document 3) require that working group operates on voluntary basis and is accessible to all interested stakeholders. Standard setting rules (document 1) define parties may be rejected if the nomination would risk the balance of interests in the working group.
- The expertise in subject matter is required in working group regulations (document 3) that assume that qualified working group is composed of qualified experts. Inclusion of materially affected stakeholders is not specifically required.
- The procedure complies with PEFC requirement

Process

• The PEFC Russia has made a comprehensive stakeholder analysis and has a list of 188 relevant stakeholders that have been contacted and asked to comment the draft standard. All contacted and interested stakeholders had given the opportunity to participate in the working group but only five did (Table 6.1). The competence of the working group members is narrow and lacks e.g. environmental and social expertise.



Table 6.1 Composition of Standard Setting Working Group

	Organisation	Interest group
1	Centre for Development of Forest Certification –PEFC Russia	certification
2	Khabarovsk Forest Certification Centre	certification
3	Metsa Group	industry
4	MM-Efimovsky	industry
5	Russian Research institute for Silviculture and Mechanization of Forestry (VNIILM)	research

• The process <u>complies</u> with PEFC requirements because stakeholders were given the opportunity to participate. Better methods to engage a representative group of stakeholders in standard setting would be necessary in the following revision. Currently the lack of environmental and social expertise and interest in the working is a handicap.

4.5 The standardising body shall establish procedures for dealing with any substantive and procedural complaints

Procedures

- Ad hoc Appeals Commission established under the supervision of PEFC Russia are responsible for any appeals procedures (see System regulation (document 1), Appeals procedures (document 4). Appeals procedures also apply standard setting (Standard setting rules (document 2)).
- The procedure <u>comply</u> with PEFC requirement.

Process

• The complaints procedures were not applied in the standard revision (n.a).

6.1.2 Standard Setting Process

5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.

5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.

Procedures

- Standard setting rules (document 2) require stakeholder identification including disadvantaged stakeholders.
- The procedure <u>comply</u> with PEFC requirement.

Process

 188 stakeholders have been identified and invited by PEFC Russia for consultation of draft standard.



- The stakeholder mapping included a broad range of stakeholder groups including indigenous groups. However, the PEFC Russia did not present any procedures indicating how they looked for disadvantaged stakeholders and how they would address any constrains that may have been hindering their participation in standard setting.
- <u>Minor non-conformity</u> to the PEFC requirement (Appendix 1, 5.2. Process) that should be addressed in the following revisions.

5.3 The standardising body shall make a public announcement of the start of the standardsetting 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. The announcement and invitation shall include: a) information about the objectives, scope and the steps of the standard-setting process and its timetable, b) information about opportunities for stakeholders to participate in the process, c) an invitation to stakeholders to nominate their representative(s) to the working group/committee, d) an invitation to comment on the scope and the standard-setting process, and e) reference to publicly available standard-setting procedures.

5.4 ...shall review the standard setting process based on the comments received. acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation...

Procedures

- The Standard setting rules (document 2), that is largely a copy of PEFC requirements; outline the procedures for information on and invitation to the standard setting process. The current procedures set detailed requirements on the content of invitation but these requirements were not part of the documentation valid in 2012 and thus not implemented in practice.
- The procedures <u>comply</u> with the PEFC requirement.

Process

- The invitation was placed on Internet www.pefc.ru in January 2012 and a stakeholder seminar with 10 different interest groups was held in the end of 2012. Some phone/email invitations were also made in 2013.
- Invitation for participation in standard drafting is not compliant with the detailed content required by the PEFC Council and FCR procedures
- No comprehensive schedule on the planned standard revision procedures has been provided.
- The evidence indicates that the working group of five members prepared a draft in 2012-2013 and invited stakeholders to comment in summer 2013.
- <u>Minor non-conformity</u> to the PEFC requirement (Appendix 1, 5.3. b, c, d Process) due to an unclear format of invitations for participation in standard drafting and no comprehensive schedule on the planned standard revision procedures.



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, b) all members of the working group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts, and 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

- Internet is the main information channel PEFC Russia shall use to inform on standard setting and to share draft documents.
- The rules of standard setting working group require amendments that ensure a full transparency of information sharing between working group members.
- Working group regulations (document 3) do not require transparency in information sharing between working group members. The regulations do not specify how the views and proposals of the members shall be addressed in order to ensure open, transparent, and recorded discussion and decision-making. The working group had only a few, if any, meetings in person and most discussions were done through email or phone. With this background, it would have been important to have procedures for consideration of individual views/proposals.
- Working group regulations (document 3) require consensus decisions.
- <u>Minor non-conformity</u> to the PEFC requirement (Appendix 1, 5.5. a Procedures) because the working group has not described the internal procedures that ensure transparency of information and decision making in the group.

Process

- Most members in the small working group were content with the access to the material but at the same time, not all of them were familiar with the standard setting procedures. They also had the possibility to comment draft but their comments were not always thoroughly discussed and taken into consideration.
- The minutes of the working group meetings in 2012-2013 (in person or telephone) were not available. The minutes of the meetings held during documentation update in 2015 do not contain information on the discussed issues.
- The working group published the comments given to the draft standard in large consultation in Oct 2013 (open to working group members) in Internet along with their consideration.
- <u>Minor non-conformity</u> to the PEFC requirement (Appendix 1, 5.5. c Procedures) because of the lack of detailed description of the decision-making procedures and consideration of different views within the working group.



6.1.3 Public Consultation

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, b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable, c) the enquiry draft is publicly available and accessible, d) the public consultation is for at least 60 days, e) all comments received are considered by the working group/committee in an objective manner, (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

- Standard setting rules. a copy of PEFC requirements, which require a public consultation for 60 days. The rules do not specify the media or information procedures on public consultation, nor do they describe how the received comments are discussed and addressed. Despite of the potential for improvement the procedure meets with the set requirements.
- The procedure <u>complies</u> with the PEFC requirements. However, the suitable media and timely manner should be defined.

Process

- The first public consultation published in Internet was held in summer October 2013. Second consultation for technical comments was opened from November 1, to December 31, 2013. The third consultation on the technically updated standard of 2015 was held during the assessment in November 20, 2014 to January 20, 2015. Only the first consultation allowed expression of substantial comments that would have a larger impact on standard requirements.
- Disadvantaged stakeholders have been invited to comment the drafts. In addition, special contacts were made to a few ENGOs.

The comments are available only from one consultation.

• The process <u>complies</u> with PEFC requirements.

6.1.4 Pilot Testing

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

- New documentation of 2015 on standard setting requires pilot testing for new standards.
- Testing is not required in standard revision (n.a).
- The procedures and process <u>comply</u> with PEFC requirement.



6.1.5 Decision-making in Standard Setting

5.8 The decision of the working group to recommend the final draft for formal approval shall be taken based on a 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, b) direct negotiation between the stakeholder(s), c) dispute resolution process.

Procedures

- Working group regulations (document 3) and standard setting rules (document 2) require consensus decisions within the working group and specify the different ways to reach a consensus. Procedures for dealing with negative votes and possible appeals procedures are described.
- The procedures <u>comply</u> with the PEFC requirement

Process

- The working group members confirmed that standard was agreed on in a consensus.
- No disputes were raised during the standard setting.
- The process complies with the PEFC requirement

5.10 Documentation on the implementation of the standard-setting process shall be made publicly available

5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.

5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.

Procedures

- Standard setting rules (document 2) set public standard setting procedures and require a formal approval of the standard within the System and publication of issued standards. System description and working group regulations have supportive requirements
- The procedures <u>comply</u> with the PEFC requirement. However, the relevant mass media and publicity of standard setting/revision procedures and relevant records (minutes, etc.) should be defined more in detail to ensure good adaptation at a national level.

Process

- The standard setting rules valid in 2013-2014 were made available in Internet. The new rules (document 2) were placed in Internet in February 2015.
- Standard was approved by working group members and adopted by PEFC Russia before publishing in Internet (www.pefc.ru) in 2015.
- The process <u>complies</u> with the PEFC requirement



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6.1.6 Revision of Standards

6.1 The standards/normative documents shall be reviewed and revised at intervals that do not exceed a five-year period.

6.2 The revision shall define the application date and transition date of the revised standards/normative documents.

6.3 The application date shall not exceed a period of one year from the publication of the standard.

6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances

- Standard setting rules (document 2) and system description (document 1) require revision
 of normative documents at five-year intervals. The new standards shall come into effect
 within one year from its publication. When the standards are approved in PEFCC, PEFC
 Russia shall issue an order on the effective and expiry dates of transition period for
 revised standards/normative documents National standards in Russia need to have a
 formal national registration before they can be implemented.
- The technical requirements on standard revision <u>comply</u> with PEFC requirements.

6.2 Conformity to PEFC ST 1002:2010 Group Forest Management Certification (Checklist Part II)

4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010: a) the group organisation, b) the group entity, c) the participant, d) the certified area, e) the group forest certificate, and f) the document confirming participation in-group forest certification.

4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by <u>additional group or individual forest management certifications</u>, the scheme shall ensure that non-conformity by the forest owner identified under one-forest management certifications is addressed in any other forest management certification scheme that covers the forest owner.

- System regulations (document 1) sets requirements for certification of groups of forest managers (joint certification) and for certification of administrative and geographic area of lesnichestvos (territorial certification).
- Group organisation, entity and applicants are well defined and participation in-group certification is based on a voluntary written commitment (a)-c)). The certified forest area in both group certification is the certified forest area of committed members and not e.g. the area of lesnichestvo, which conforms to PEFC requirement d).
- Russian definition for group certificate and attestation given to each members are copied from PEFC standard (d)-f)).
- FCR requirement to consider non-conformities identified in other PEFC certifications (4.1.2) is copied from international PEFC document.
- Definition of group certification <u>complies</u> with PEFC requirements



4.1.3 The forest certification scheme shall define requirements for group forest certification, which ensure that participants' conformity with the sustainable forest management standard is centrally administered and is subject to central review and that all participants shall be subject to internal monitoring programme.

4.1.4 The forest certification scheme shall define requirements for annual internal monitoring....

- In joint certification, the nominated applicant entity has the responsibility to assure that participants conform to standard requirements and that annual internal monitoring programme is implemented.
- For territorial certification, same responsibilities apply.
- The group regulations ensuring participants' conformity to forest management standard <u>comply</u> with PEFC requirements

Functions and Responsibilities of a 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

b) To provide a commitment on behalf of the whole group organisation on compliance

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

d) To keep records of: conformity, participants' contact details, certified area, internal monitoring

e) To establish connections with all participants based on a written agreement

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

g) To provide all participants with information and guidance

i) To operate annual internal monitoring...

i) To operate a review of conformity with the sustainable forest management standard... corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.

- System regulation (document 1) provisions for functions and responsibilities of the group entity are copied from the PEFC standard for joint certification.
- In joint group certification, the group entity shall have written procedures for group management c) and a commitment from each member to respect standard requirements (a-b). Lesnichestvos represent group organisation (a) and according to the PEFC Russia System Regulations (2015), they "have the same functions and obligations as they would have under joint certification".
- Both joint and territorial group certification require written agreement with participants (see Membership commitment (document 5 for the text), an attestation on participation to group certification (e-f) and provision of adequate guidance (g).
- Group entity shall operate annual internal monitoring programme on participants (h-i)
- The Membership commitment, agreement signed to group entity specifies the obligations of members and defines the rights of group entity in enforcement of corrective actions or exclusion of a member under defined conditions.
- Functions and Responsibilities of group entities comply with PEFC requirements



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4.3.1 Functions and Responsibilities of Participants:

a) To provide the group entity with a written agreement, including a commitment on conformity

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

c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body

d) To implement relevant corrective and preventive actions.

- The System regulation (document 1) and Membership commitment (document 5) set conforming requirements for participant's responsibilities.
- Participants shall sign a written agreement with group entity and comply with the forest management standard and other group certification requirements (a) – d)).
- Functions and Responsibilities of participants <u>comply</u> with PEFC requirements

6.3 Conformity of PEFC Russia Forest Management Standard

6.3.1 Analysis of FCR Forest Management Standard

The PEFC Russia approved the FCR Forest Management and Use Standard (2014) in November 2014. In March 2015, PEFC Russia submitted a new standard version that has mainly editorial changes compared to the original revised standard submitted for the conformity assessment. The minor specifications to the standard made in August 2015, are also taken into consideration in this assessment.

The assessment results presented below are based on the FCR Forest Management Standard of 2015 (document 6). Detailed assessment results by each PEFC requirement are presented in Appendix 1 (see Checklist Part III p. 54).

6.3.2 Results

Conformance to PEFC Requirements for Forest Management

General requirements: The forest management standard <u>comply</u> with the general PEFC requirements on

• Structure of management and performance requirements applicable to different types of forest types (PEFC Checklist Part III 4.1 a-d)



PEFC C1 Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle

The FCR standard requires maintenance of forest resources through systematic planning and its implementation and revision based on monitoring. Environmental impact assessments shall be in place and provide information for forest management planning. Summaries of the plan shall be made public.

✓ <u>Conforms</u> to PEFC Checklist Part III requirements 5.1.1- 5.1.12.

PEFC C2 Maintenance of forest ecosystem health and vitality

Insect damages and forest fires are common in Russian forests. Forest management takes measures to minimize the risk for damage and to prevent its spreading to intact forests. FCR standard requires systematic monitoring of health risks and taking measures to minimize the risk. It also address the restrictions on chemical use.

The standard restrictions on pesticide use were specified in August 2015 and are currently in compliance with PEFC ST 1002:2010. The standard could be still more informative and refer to the valid national regulations on pesticide use instead of only referring to the Stockholm Convention on Persistent Organic Pollutants and WHO classification on chemicals.

✓ <u>Conforms</u> to PEFC Checklist Part III requirements 5.2.1- 5.2.12.

PEFC C3 Maintenance of productive functions of forests

The FCR standard requires adaptation of harvesting levels to sustainable long-term production potential of forests. It also asks forest managers to aim at multiple forest products and services, including non-timber products. Forest management policy implies that the manager is committed to respect the diversified production of forests. Silvicultural regime shall assure appropriate regeneration and tending and it shall be implemented in a time. In infrastructure development, environmental damages shall be avoided. No genetically modified organisms shall be used.

✓ <u>Conforms</u> to PEFC Checklist Part III requirements 5.3.1- 5.3.8.

PEFC C4 Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems

The FCR standard requires maintenance and enhancement of biodiversity and forest management planning shall identify biologically valuable forest areas and by supporting natural forest structures. Harvested sites shall be regenerated by planting, seeding, or using natural regeneration. Harvesting damages to remaining stands shall be avoided.

In species protection, the standard refers to the national list of endangered species (Red Listed species) and restrictions on harvesting of specific species (August 2015 amendment).

✓ <u>Conforms</u> to PEFC Checklist Part III requirements 5.4.1-5.4.13.

PEFC C5 Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)

Environmental impacts assessment shall identify the forest areas with protective functions. In addition, degradation and disturbances in forest ecosystem shall be avoided and appropriate preventive measures need to be taken.

The standard sets specific requirements on harvesting planning in order to minimize the damages caused by machinery or by disturbances to waterways. Adequate water protection zones shall be established.

✓ <u>Conforms</u> to PEFC Checklist Part III requirements 5.5.1 - 5.5.5.



PEFC C6: Maintenance of other socio-economic functions and conditions

Forests have a significant economic and social importance at local and national levels in Russia. Locally people use forests to collect various non-wood forest products or hunt to complement their own consumption and/or incomes by selling them as such or processed to the markets. Many households also use firewood as an essential energy source. In addition, there are several indigenous groups whose livelihood and/or culture is dependent on forests.

FCR standard requires diversification of production and provision of goods and services for local population and preference of local people in employment, when possible. The indigenous groups and the areas of their traditional use shall be defined in forest management planning and taken into consideration as appropriate. Russian Federation has not ratified the ILO Convention on Indigenous and Tribal People (Table 6.2), but the key requirements of that convention are included in the FCR standard (see FCR Criteria 6.5 and 6.9 and Appendix 1, requirement 5.6.4).

Fundamental ILO Conventions	Name and Year	Status in Russia		
Number				
ILO No 29	Forced Labor, 1930	23 June 1956		
ILO No 87	Freedom of Association and Protection of the Right to Organize, 1948	10 August 1956		
ILO No 98	Right to Organize and Collective Bargaining, 1949	10 August 1956		
ILO No 100	Equal Remuneration, 1951	30 April 1956		
ILO No 105	Abolition of Forced Labor, 1957	02 July 1998		
ILO No 111	Discrimination (Employment and Occupation) 1958	04 May 1961		
ILO No 138	Minimum Age for Admission to Employment, 1973	03 May 1979		
ILO No 182	Worst Forms of Child Labour Convention, 1999	25 March 2003		
Other ILO Conventions referred by PEFC Council				
ILO No 155	Occupational Safety and Health Convention, 1981	02 July 1998		
ILO No 169	Indigenous and Tribal People's Convention, 1989	Not ratified		
Source: http://www.ilo.org/dvn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102884				

Table 6.2 **Ratification Status of Selected ILO Conventions in Russia**

ce: http://www.ilo.org/dyn/normiex/en/t?p=1000:11200:0:::NO:11200:P11200_COUNTRY_ID:102884

Russian Federation also ratified the Stockholm convention on persistent organic pollutants on 17/08/2011 and the Convention on Biological Diversity on 05/04/1995.

Conforms to PEFC Checklist Part III requirements 5.6.1 - 5.6.14.

PEFC C7 Legal compliance

The standard requires legal compliance and prevention of unauthorized activities to take place in certified forests.

Conforms to PEFC Checklist Part III requirements 5.7.1-5.7.2



6.4 Chain of Custody Standard

PEFC Russia has adopted the PEFC standard Chain of Custody of Forest Based Products – Requirements (PEFC ST 2002:2013) to be used in chain of custody certification under the PEFC Russia Forest Certification System.

✓ The arrangement <u>complies</u> with the PEFC requirements.

6.5 Implementation of PEFC Logo Use Requirements

The System regulations (Sec 4.3) (document 1) and Guide Issuance of PEFC Logo Use Licenses by PEFC Russia (document 10) require that issuance and use of PEFC Logo shall conform to the PEFC Logo Use Rules (PEFC ST 2001:2008).

The System regulations require that certification bodies shall control the logo use and this requirement is enforced in the logo licencing contract (document 10) or notification of certification bodies for chain of custody certification (document 8).

- ✓ Logo Usage Rules conform to PEFC requirements (PEFC Checklist IV 15) and PEFC Logo Usage Rules.
- \checkmark The logo usage rules <u>comply</u> with the PEFC requirements.

6.6 Certification and Accreditation Arrangements

PEFC Checklist IV Standard and System Requirement Checklist for certification and accreditation procedures (Annex 6)

6.6.1 Analysis

The FCR System requires that certification and accreditation procedures be in accordance with international requirements as defined by International Accreditation Forum (IAF) and relevant ISO standards. The Russian accreditation body STC-IS is a member, but it is not signatory to the IAF Multilateral Agreement. Thus it complies with PEFC requirements for accreditation bodies for forest management and scheme specific chain of custody, but it does not comply with the requirements of certification bodies certifying against PEFC international chain of custody standard (for evidence see (PEFC ST 2003:2012¹). For chain of custody certification, the FCS System requires accreditation in line with PEFC requirements, which currently requires reliance on international accreditation bodies.

6.6.2 Results

Certification Bodies

- 1. 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?
- 2. Certification body doing forest management certification shall fulfil requirements defined in ISO 17021 or ISO Guide 65?
- In System regulation (document 1) the FCR System requires that certification bodies meet the requirements set for management system certification in ISO 17021 standard and also the requirements for product certification in ISO 17065 standard.
- In addition, the System requirements for technical competence and understanding of the national forest certification system conform to PEFC requirements.
 - Requirements for certification bodies and their technical <u>comply</u> with the PEFC requirements

¹ PEFC ST 2003:2012. Certification Body Requirements – Chain of Custody.

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- 5. Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical expertise on the certification process and issues related to forest management or chain of custody certification?
- 6. 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?
- 7. Does the scheme documentation include additional qualification requirements for auditors?
- 10. Applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011 carrying out forest management or chain of custody audits?
- System regulations (document 1) outline detailed technical competence requirements for auditors and a requirement to comply with the ISO 19011 standard in audits.
 - Requirements for competence of auditors and audit procedures <u>complies</u> with the PEFC requirements.

Certification Procedures

FCR System regulations (document 1), Notification documents (documents 7 and 8) **conform** to the following PEFC requirements

- Certification bodies shall have internal procedures. Accreditation to ISO 17021 in forest management implies that certification bodies shall describe internal certification procedures (PEFC Checklist IV 8, 9)
- Certification bodies shall inform on issued certificates and on any changes in their status (PEFC Checklist IV 11)
- ✓ FCR System requires annual surveillance audits and re-certification audits in forest management every three years and in chain of custody certification every five years (PEFC Checklist IV 13, 14)
- ✓ Public availability of summaries to certification reports on forest management. System regulation require that applicant shall make the report public and notification rules require that certification bodies shall give the summary report to PEFC Russia PEFC Checklist IV 15).
- Certification process shall include consideration of opinions from third parties (PEFC Checklist IV 16)
- Certification body shall carry out controls of logo usage...The System regulations require that certification bodies shall control the logo use and the requirement is enforced e.g. in the logo licencing contract (document 10) and notification of certification bodies for chain of custody certification (document 8) (PEFC Checklist IV 12).
- Requirements on certification procedures <u>comply</u> with the PEFC requirements.

Accreditation Procedures

FCR System regulations (document 1), Notification documents (documents 7 and 8) **conform** to the following PEFC requirements

✓ Certification bodies shall be accredited by a national accreditation body that is a a member of IAF and in chain of custody certification also a signatory to MLA agreement (PEFC Checklist IV, 18, 20) and do certification as accredited operation (PEFC Checklist IV, 21). In 2015, PEFC Russia recognized also accreditations done by non-Russian accreditation bodies that are IAF members and comply with the requirements. In earlier 2014 notification requirements in forest management certification, only the



accreditation from the Russian national accreditation body (i.e.) Scientific Technical Centre on Industrial Safety (STC-IS)) was recognized.

- Certificates shall also be marked with a sign of accreditation body (PEFC Checklist IV, 19, 20)
- All certification bodies shall be notified. Different non-discriminatory requirements for certification bodies (22-23). The notification document on chain of custody certification was amended in August 2015.
- ✓ Requirements for accreditation procedures <u>comply</u> with the PEFC requirements.

Administration

System regulations conforms to the following PEFC requirements

- ✓ Notification of certification bodies (PEFC Checklist Part VI, 1)
- ✓ Procedures for issuance of PEFC logo licenses (PEFC Checklist Part VI, 2)

Appeals procedures (document 4) conform to the following PEFC requirements

- PEFC Checklist Part VI, 3 on complaint procedures related to standard setting, interpretation, and logo use.
 No information on the appeals during the standard setting was given, thus the procedure has not
 - ✓ Requirements System administration comply with the PEFC requirements.



7. STAKEHOLDER VIEWS

7.1 National Consultation

In order to identify perception of various interested parties on the process of standard revision Indufor has sent a questionnaire (presented in the Appendix 1) to 38 stakeholders - 5 members of the Working Group, 4 active participants indicated by PEFC Russia and 29 other stakeholders representing forest industry, environmental organizations, NGOs and other interested parties. A full list of stakeholders invited for participation in the survey is presented in the Appendix 3.

The questionnaire was prepared in Russian and distributed by email in three turns – on August 19, September 1 and September 10, 2014. The respondents were asked to send back their replies within two-week time and seven replies were received.

The majority of replies have been rather positive. All the respondents have been clearly satisfied about the provision of adequate material for participation in the standard revision and nearly three fourths considered that the views and opinions of different parties in standard setting had been sufficiently taken into consideration. Slightly over half of respondents agreed that all interested parties had been given the possibility to participate and contribute to the standard revision process and that the whole process had been well planned. The same amount of respondents perceived the process of revision to had followed procedures and rules, decisions had been adopted in consensus and imply dispute resolution procedures in case of any emerging conflicting views among participants. In addition to that, participating stakeholders were generally believed to represent the range of interests of forest use in Russia.

Nearly 40% of respondents had an opinion that some aspects of the revised standard deserved further consideration and indicated them in the graph "comments". Among these issues, they listed: methods of conservation of biodiversity, accreditation by certification authorities and adaptation of international criteria and indicators of sustainable forest use to Russian conditions. A detailed summary of replies is presented below in Table 7.1.

N₽	Question	Company	Answer	Comments
1 By whom and when were you invited to participate to the development of the standard for PEFC Forest	Certification body	PEFC Russia October 2013	Sent comments to the standard in September 2013. In October 2013 was invited for a phone conference	
	Forest industry	PEFC Russia, October 2013	The standard of forest management was available at the website of pefc.ru. After leaving a comment, I have been included into the Working Group	
	certification?	Forest industry	PEFC Russia, 2011	In the course of preparing MM-Efimovsky for the PEFC certification there have been discussions on some aspects of the revised future standard
		Research institute	PEFC Russia, January,1 2012	Management authority of the system PEFC Russia (PEFC-FCR) has announced about revision of documents and standards of the system PEFC Russia (PEFC-FCR) in accordance with new requirements for PEFC standards on the website <u>http://pefc.ru/</u>
		Forest industry	PEFC Russia, end of	

Table 7.1Summary of Replies from Members of Working Group and Active
Participants



Nº	Question Company Answer		Answer	Comments
			September 2013	
		Forest owner/ manager	PEFC Russia, February 2014	
		Research institute	PEFC Russia, 2011-2013	Discussions over questions connected to maintaining high level of biodiversity typical for some types of forest communities, preservation of places where endangered species are concentrated, discussions about problems of sustainability of forest ecosystems; opportunities for participation of forest industrial companies in creation of specially protected natural conservation areas
2	In your view, were all interested parties given the possibility	Certification body	No	Too few stakeholders have participated in discussions. 4-5 people participating in the phone conference are exceptionally few for Russia
	the possibility to participate and contribute to the scheme development and revision?	to Forest industry		The documents were available at the website of pefc.ru
		Forest industry	Yes	The process of the revision of the standard was open to the maximum
		Research institute	No	No comments
		Forest industry	n/a	The information was presented at the website of PEFC
		Forest owner / manager	Yes	All interested parties have participated in discussions. I have not seen any special preferences.
		Research institute	Yes	
3	Did the organizer	Certification body	Yes	We have been provided with the text of the standard
	provide you with adequate material to participate in the standard development before and during the process?	Forest industry	Yes	The documents were available at the website of pefc.ru, as well as sent to my email address
		Forest industry	Yes	
		Research institute	Yes	The documents were available at the website <u>http://pefc.ru</u>
		Forest industry	Yes	
		Forest owner / manager	Yes	I had a possibility to see the current text of the standard and incoming comments for amendments.
		Research institute	Yes	



Nº	Question	Company	Answer	Comments
4	Was the development and revision process well	Certification body	n/a	Cannot comment on the development and revision of the standard, as I do not have any information (regarding it)
	planned and structured?	Forest industry	No	There has not been any meeting apart from phone calls. It would have been necessary to create a working group in advance (half a year/one year prior) and carry out a full revision of the standard with participation of all interested parties and collected experience, but this has not been done
		Forest industry	Yes	All required procedures for revision of the standard have been fulfilled
		Research institute	Yes	The process has been carried out in accordance with the document PEFC-FCR Annex 13
		Forest industry	n/a	
		Forest owner / manager	Yes	
		Research institute	Yes	
5	Did the process follow procedures or rules that were informed to participants in advance?	Certification body	n/a	Procedures and rules have not been provided
		Forest industry	No	The decision upon the final version of the Standard has to be done based on a consensus. However, the decision has been adopted by part of the Working group.
		Forest industry	Yes	
		Research institute	Yes	The process has been carried out in accordance with the document PEFC-FCR Annex 13. Check also Annex 4
		Forest industry	n/a	Methodology and rules have not been presented
		Forest owner / manager	Yes	
		Research institute	Yes	
6	Were the views and opinions of different parties in standard setting taken into consideration as appropriate	Certification body	No	Developers of the standard were very unwilling to modify indicators of the standard, even if several stakeholders had supported the initiative. There had to be implemented considerably more changes than it has been done
		Forest industry	Yes	Comments and suggestions of different interested parties have been taken into account partly
	during the	Forest industry	Yes	As it has been noted before, the process was open to the maximum



N≌	Question	Company	Answer	Comments
	standard development?	Research institute	Yes	A summary of remarks at the website <u>http://pefc.ru/</u>
		Forest industry	n/a	There have to be made more changes, than it has been done
		Forest owner / manager	Yes	
		Research institute	Yes	
7	Were the criteria (requirements) in the standard agreed on in consensus?	Certification body	No	No, in regards to many indicators stakeholders have announced serious concerns about their feasibility and/or clarity, though many commentaries have not been taken into account
	CONSENSUS :	Forest industry	No	I, personally, have not voted for a standard in its current state, although, according to the information at the website, I am a member of the Working group
		Forest industry	Yes	
		Research institute	Yes	The process has been carried out in accordance with the document PEFC-FCR Annex 13
		Forest industry	n/a	Some requirements have been taken into account, some – not
		Forest owner / manager	Yes	
		Research institute	Yes	
8	Did the participating stakeholders represent the range of interests in	Certification body	No	No, 2 or 3 industrial companies and 1 certification body have been represented in discussions (from those stakeholders, which I have heard of). There has been no representation of governmental authorities, other certification bodies etc.
	forest use in your country? If not, which other interests groups should have participated?	Forest industry	No	For example, governmental authorities regulating forestry relations
		Forest industry	Yes	Look commentaries to questions 2 and 6
		Research institute	Yes	When developing the standard the participants have represented all range of interests of forest use. Check: Annex 1, Annex 4
		Forest industry	n/a	There have not been any representatives of authorities
		Forest owner / manager	Yes	
		Research institute	Yes	



Nº	Question	Company	Answer	Comments			
9	Was there any dispute settlement procedures in	Certification body	No	I have no knowledge about such procedures, many questions have been left open, and indicators have not been changed			
	case of	Forest industry	n/a	I have no knowledge about it			
	conflicting views between	Forest industry	Yes				
	members of standard setting working	Research institute	Yes	In accordance with the document PEFC-FCR Annex 13. Check out also: Annex 1, Annex 4			
	group?	Forest industry	n/a	I do not know about such procedures			
		Forest owner / manager	Yes				
		Research institute	Yes				
10	Do you believe any aspects of the scheme	Certification body	No	The full table of commentaries has been submitted by the developers of the standard			
	deserve	Forest industry	Yes	Accreditation of the certification authorities:			
	further consideration?			In accordance with the document FCR SYSTEM REGULATIONS Eng. article 4.5 a certification, body can obtain accreditation only from a Russian national accreditation body, although in the previous version of this document there was an opportunity to obtain accreditation also from an international accreditation body.			
				The standard of forest management:			
				Many indicators are impossible to evaluate in practice. It is necessary to adapt international criteria and indicators of sustainable forest use to Russian conditions, what has not been done.			
					Forest industry	No	In my opinion further revision of the scheme is reasonable only after implementing and testing already approved changes on practice and also after it is seen that implemented changes produce only positive results
		Research institute	Yes	There might be a need for some adjustments when reregistering the system in Rosstandard (<i>Federal Agency on Technical</i> <i>Regulating and Metrology</i>)			
		Forest industry	n/a	Yes, there are some aspects which need further consideration			
		Forest owner / manager	No				
		Research institute	Yes	Some criteria on principle 4 related to methods of conservation of biodiversity			

The most important remarks have been compiled into a separate table (Table 7.2) indicating also their consideration in the assessment.



Table 7.2 Remarks of Respondents

Remarks of respondents	Assessor's comments
Too few stakeholders have participated in discussions. 4-5 people participating in the phone conference are exceptionally few for Russia.	Unrepresentativeness and small size of standard setting working group raised concerns in the assessment. Nevertheless, there is no evidence that any party informed was denied an access to participate. Over 200 parties were informed by email, seminars or phone. It is evident that the invitation was not proper, as it was not efficient. The fact that the outcome was not the desired one does not justify a major non- conformity, although it hampers the standard setting process.
Procedures and rules have not been provided. Information appeal procedures were not informed.	The lack of information on standard setting process is discussed in the assessment (classified as a minor non- conformity in the Appendix 1 5.5 c Procedures)
2 or 3 industrial companies and 1 certification body have been represented in discussions	
There has not been any meeting apart from phone calls.	Addressed in the assessment as lack of
The decision upon the final version of the Standard has to be done based on a consensus. However, the decision has been adopted by part of the Working group.	participatory decision making meaningful means to contribute (classified as a minor non-conformity in the Appendix 1 5.5 c Procedures)
Unwillingness to modify indicators of the standard, even if several stakeholders had supported the initiative.	
There have to be made more changes, than have been done.	The assessment raised the need to adapt too general or copied
In regards to many indicators, stakeholders have announced serious concerns about their feasibility and/or clarity, though many commentaries have not been taken into account. Many indicators are impossible to evaluate in practice. It is necessary to adapt international criteria and indicators of sustainable forest use to Russian conditions, what has not	requirements to national context in order to assure their applicability at forest management unit level (Chapter 2 Recommendations).
been done. There might be a need for some adjustments when	The standard will require formal national approval. If it causes changes into forest
reregistering the system in Gosstandard (Federal Agency on Technical Regulating and Metrology).	management standard will be seen in the future.
Accreditation of the certification authorities: In accordance with the document FCR SYSTEM REGULATIONS article 4.5 a certification body can obtain accreditation only from a Russian national accreditation body,	This requirement has been changed in the notification requirements in January 2015.
In my opinion further revision of the scheme is reasonable only after implementing and testing already approved changes on practice and also after it is seen that implemented changes produce only positive results	



7.2 International Consultation

No comments from international consultation were submitted for the assessment.



Appendix 1

Indufor Assessment on the Compliance of Russian FCR System with the Requirements of PEFC Standard and System Requirement Checklist (PEFC IGD 1007-01:2012 (v 2014-05-06) Table of Content

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1 Purpose

This Appendix describes in detail the compliance of Russian Forest Certification System (referred to as FCR System or PEFC Russia System) with the requirements of PEFC Council and its Technical Documentation.

2 Indufor Assessment Scale

The conclusions on compliance are based on the FCR System documentation and other evidence provided by the PEFC Russia before and during the assessment. The Indufor conclusions are presented, justified and explained as follows:

- Column YES/NO presents the conclusion on compliance with PEFC requirements.
- Column Document presents the FCR System document or other evidence that provide evidence to form a conclusions on the compliance.
- Indufor conclusions are explained in detail only a) in case of a non-compliance and b) if referred documents do not clearly present an evidence on conformity.

PEFC Council is critical to inclusion of copied parts of PEFC standard requirements in national standards, because the PEFC requirements are often general and do not reflect the specific conditions or needs of the applicant country. Indufor has taken the following approach towards the copied standard requirements:

- copied requirements are noted with a comment.
- if the copied standard requirement is explicit in any kind of conditions the copied criteria/indicator is considered as complying, (e.g. public consultation shall last 60 day or similar)
- if the copied requirement would require national interpretation before it can be applied at a national or FMU level a comment is raised.

3 **PEFC Russia Documentation**

PEFC Russia revised a number of scheme documentation during the assessment. The documents valid in the initiation of the assessment are presented below.

No	Name of the Document (March 2015)	Document in force in 2013-2014	Abbreviation of the document name
1	PEFC Russia System Regulation.2015	FCR system regulation (2014)	System regulations
2	Rules and Programme for PEFC Russia Standards Setting, Review and Approval. 2015	Rules and Program for Standard Development and Approval (Annex 13) (Feb. 2014) Statutes of Stakeholders Forum on Standard Development (Annex 4)	Standard setting rules
3	Regulations on the Working Group for Consideration, Review, and Adoption of Forest Management Standard of Voluntary Forest Certification System of PEFC Russia. 2015	n/a	Working Group regulations
4	Regulation of Appeals Commission of PEFC Russia System. 2015	Regulations on Appeals Commission (Annex 3) (2014)	Appeals procedures
5	Declaration of Membership in PEFC Group Certification System. 2015	Declaration of membership to regional PEFC certification (Annex 9)	Membership commitment
6	PEFC Russia Forest Management Standard. 2015	Forest Management and Use Standard PEFC-FCR-ST-01-2014 (Annex 10) (2014)	FM Standard
7	Guidelines for notification of certification bodies operating PEFC forest management certification in the Russian Federation	Guidelines for notification of certification bodies operating PEFC forest management certification in the Russian Federation against the PEFC-endorsed	FM notification ND- 001

Normative Documents in 2012-2014

No	Name of the Document (March 2015)	Document in force in 2013-2014	Abbreviation of the document name
	against the PEFC-endorsed national certification system. ND-001 2015	national certification system. ND-001 – 2012	
8	Guidelines for Notification of Certification Bodies Carrying Out PEFC Chain of Custody in the Russian Federation Against the PEFC Endorsed Certification System PEFC Russia. ND-002 2015	Guidelines for notification of certification bodies operating PEFC chain-of-custody certification in the Russian Federation against the PEFC-endorsed national certification system. ND-002 – 2013	CoC notification ND- 002
9	PEFC Russia has adopted the PEFC ST 2002:2013 (Chain of Custody of Forest Based Products - Requirements) in PEFC Russia system for chain of custody certification. (Resolution of PEFC Russia General Meeting). Date not available.	PEFC ST 2002:2013	PEFC ST 2002:2013
10	Annex 14 PEFC-FCR-2014 Guide Issuance of PEFC Logo Use Licenses by PEFC Russia	same document	Logo licensing guide
11	PEFC Logo Usage Rules – Requirements PEFC ST 2001-2008	PEFC ST 2001-2008	

Analysis of the written FCR System procedures is based on the latest available documentation and the revised documents are listed in the table below.

Documents updated during interruption of the assessment in summer 2015

No	Name of the Document (August 2015)	Name of the Document (March 2015)	Abbreviation of the document name
1	PEFC Russia System Regulation.2015	PEFC Russia System Regulation.2015	System regulations
6	PEFC Russia Forest Management Standard. 2015	PEFC Russia Forest Management Standard. 2015	FM Standard
8	Guidelines for Notification of Certification Bodies Carrying Out PEFC Chain of Custody in the Russian Federation Against the PEFC Endorsed Certification System PEFC Russia. ND-002 2015	Guidelines for Notification of Certification Bodies Carrying Out PEFC Chain of Custody in the Russian Federation Against the PEFC Endorsed Certification System PEFC Russia. ND- 002 2015	CoC notification ND- 002

Descriptive and guiding FCR System documents are listed below.

Descriptive and other documents

No	Name of the Document (August 2015)	Document in force in 2013-2014	Abbreviation of the document name		
12	Order No. 29 of Centre for Development of Forest Certification – working group for standard updating – 2012 (Annex 5) (Oct 2012)	same document	Working group members		
13	Annex 5 List of identified stakeholders	same document	Appendix 5 stakeholder list		
14	Annex 4 Questionnaire replies (domestic survey). Stakeholder replies (Russia)	same document	Stakeholder replies (Russia)		
15	Annex 6 Chronology of standard setting (provided by PEFC Russia)	PEFC Russia System development process – 2013 (Annex 1) (Nov 2013)	Standard setting process		
16	Consideration of comments received in public consultation of January 2015		Consideration of stakeholder comments		
Other c	locuments	•	- -		
17	Applicant's PEFC Standard and System Requirement Checklist PEFC IGD 1007-01:2012 (Annex 6)				
18	Summary of remarks to standard proposal (Annexes 7-8) (25-26 Oct 2013 respectively)				

Part I: Standard and System Requirement Checklist for <u>standard setting</u> (PEFC ST 1001:2010)

2 Checklist

Question	Assess. basis*	YES /NO*	Reference to application documents			
Standardising Body						
4.1 The standardising body shall have written	procedures for	r standa	ard-setting activities describing:			
		YES	1 System regulations (2015):			
	Procedures		PEFC governing body "Centre for Development of Forest Certification – PEFC Russia" organizes and develops standard and approves formally standards in the PEFC Russia System.			
			sec. 2.2.1 d) PEFC Russia considers and approves PEFC RUSSIA regulatory documents;			
a) its status and structure, including a body responsible			Standard setting procedures are described in			
for consensus building (see 4.4) and for formal			2 Standard setting rules (2015)			
adoption of the standard (see 5.11),			 PEFC Russia shall initiate standard setting and form a working group (Sec 4.1) 			
			3 Working group regulations (2015) – outline general rules for the working group			
			Complies			
			Also the earlier PEFC Russia documentation Annex 13 Rules of Standard Development Ch 1, 4, 5 implemented during the standard revision complied with the requirement			

c) the procedures for balanced representation of Procedures VES activities in accordance with Regulations (see above requirements on recording) Complies In earlier PEFC Russia documentation, Annex 13 Rules of Standard Development Sec. 4.1-4.3 5 complied with the requirement along with Annex 4 Forum Statutes CL 8: All documents relating to the development of FCR forest management standard and minutes of Forum meetings shall be presented on request to any stakeholder c) the procedures for balanced representation of VES	Question	Assess. basis*	YES /NO*	Reference to application documents
Sec. 4.1-4.3 5 complied with the requirement along with Annex 4 Forum Statutes CL 8: All documents relating to the development of FCR forest management standard and minutes of Forum meetings shall be presented on request to any stakeholder c) the procedures for balanced representation of Procedures VES Sec 4.1: PEFC Russia shall identify stakeholders relevant to the objective and scop of standard setting; Working group shall include representatives of different	b) the record-keeping procedures,	Procedures	YES	 «4. Rules for new standards setting and approval, 4.1. Organization of a new standard setting: PEFC RUSSIA shall keep records relating to the standards setting process and provide the evidence of compliance with the requirements of this document and PEFC RUSSIA's own procedures. 5. Rules for standard review, 5.1 Organization of standard review: PEFC RUSSIA shall keep records relating to the standards setting process and provide the evidence of compliance with the requirements of this document and PEFC RUSSIA shall keep records relating to the standards setting process and provide the evidence of compliance with the requirements of this document and PEFC RUSSIA own procedures. * 3 Working group regulations (2015)– «obligations: Working group shall perform its activities in accordance with Regulations (see above requirements on recording) <i>Complies</i>
	c) the procedures for balanced representation of stakeholders,	Procedures	YES	 Sec. 4.1-4.3 5 complied with the requirement along with Annex 4 Forum Statutes Ch 8: All documents relating to the development of FCR forest management standard and minutes of Forum meetings shall be presented on request to any stakeholder 2 Standard setting rules (2015) Sec 4.1: PEFC Russia shall identify stakeholders relevant to the objective and scope

Question	Assess. basis*	YES /NO*	Reference to application documents
			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 standard setting
			The balanced representation of interest categories shall be also ensured by inviting assistants and experts, mainly from underrepresented interest categories
			5 Rules for standard review, 5.1 Organization of standard review
			PEFC RUSSIA may review the standard setting process based on comments received after publication of the announcement and adjust the composition of Working Group 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 standard setting.
			Complies
			In earlier PEFC Russia documentation, Annex 13 Rules of Standard Development Sec. 4.1 valid during standard revision complied with the requirement
			2 Standard setting rules (2015) describe procedures for different steps in standard setting
d) the standard-setting process,	Procedures	YES	Complies
		In earlier PEFC Russia documentation, Annex 13 Rules of Standard Development Sec. 4.1 valid during standard revision complied with the requirement	
e) the mechanism for reaching consensus, and	us, and Procedures	YES	2 Standard setting rules (2015) 4.3 Preparation of the third (final) version of a new standard and its approval
		YES	Decision of Working Group to recommend the final version of the standard for formal approval shall be taken on the basis of a consensus.

Question	Assess. basis*	YES /NO*	Reference to application documents
			The measures to reach consensus are described. In case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, this issue shall be resolved using the internal procedures specified in Working Group Regulation. <i>Complies. The procedures to deal with disputes on standard setting are defined in 3.</i> <i>Appeals procedures</i> <i>In earlier PEFC Russia documentation Annex 13 Rules of Standard Development</i> <i>does not comply with the requirement, but Annex 4 Forum statutes did.</i>
f) Revision of standards/normative documents.	Procedures	YES	 2 Standard setting rules (2015) Ch 1 Scope: sets rules for setting and approval of standards of PEFC Russia, their review and revocation. Complies In earlier PEFC Russia documentation Annex 13 Rules of Standard Development Ch 4 complied with the requirement
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	 1 System regulations 2015– «2.2. System administration, 2.2.1. Central Body of PEFC Russia system According to the Regulation, the Central Body of PEFC Russia system performs the following functions: i) initiates regular (at least once in 5 years) revision of documents and system reregistration; j) adapts changes in the requirements of PEFC Council within 12 months following their publication; 2 Standard setting rules (2015) – «3. General provisions

Question	Assess. basis*	YES /NO*	Reference to application documents
			To ensure publicity and transparency of this programme, it shall be published in mass media and public information system at PEFC RUSSIA (www.pefc.ru) » <i>Current rules comply</i> <i>Earlier Annex 13 Rules of Standard Development did not comply.</i>
		YES	First information on the new revision process was made in January 2012 on PEFC Russia web site; www. pefc.ru. The standard setting rules used at the time of the revision process were made available to the assessor.
			14 Appendix 4 Stakeholder replies (Russia): However the replies to stakeholder questionnaire inform that all members were not aware of standard setting rules and related appeals procedures.
	Process		Regional seminar on launching of standard revision was held in Khabarovsk in 2012.
			Summer 2013 an invitation for stakeholders to comment on the draft revised standard was made.
			The standard setting rules published in 2012 in PEFC Russia website were almost identical to the rules in Annex 13 submitted to the assessment in 2014 prior to the interruption.
			Complies
4.3 The standardising body shall <u>keep records</u> relating to the standard-setting process providing evidence of compliance with the requirements of this document	Procedures	YES	2 Standard setting rules (2015) –Documents retention period is specified in PEFC Russia System Regulation (sec. 8) and in Rules for standards setting, review and approval (i. 4.1 and 5.1). Documents retention period is 5 years.
and the standardising body's own procedures. The			«5. Rules for standard review, 5.1 Organization of standard review

Question	Assess. basis*	YES /NO*	Reference to application documents
records shall be kept for a minimum of <u>five years</u> and shall be available to interested parties upon request.			PEFC RUSSIA shall keep records relating to the standards setting process and provide the evidence of compliance with the requirements of this document and PEFC RUSSIA own procedures.
			The records shall be kept by PEFC RUSSIA for a minimum of five years and shall be available to stakeholders upon request.»
			7. Retention period for standard setting, review and approval documentation.
			Stakeholders can get the information on standards setting, review and approval at website www.pefc.ru or on request sent to PEFC Russia.
			Retention period for standard setting, review and approval documentation is 5 years.
			Complies
			Earlier procedures on standard setting (Annex 13 Rules of Standard Development or Annex 4 Forum Statutes) did not comply
	Process	YES	PEFC Russia has records on received comments and short minutes of selected working group meetings. Different draft standard versions are also recorded and made available in Internet www. pefc.ru
			Complies, although it is recommended that the recording is improved.
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	Procedures	YES	 2 Standard setting rules (2015) 4.1 a working group shall be established for standard setting 5.3 Standard review revision assumes that a new standard shall be developed to replace the old one Standard settingshall comply with procedures set in section 4. Working group for preparation of amendments to the standard shall be composed mainly of standard authors.
			Complies.

Question	Assess. basis*	YES /NO*	Reference to application documents
			Earlier Annex 4 Forum Statutes Ch 5 and Annex 13 Rules of Standard Development Ch 4.1 complied with the requirement.
		YES	12 Working group members Order NPP CDFC:
	Process		 A working group on updating PEFC-FCR-01-2014 "Forest management and use standard" shall be created composed of: Research institute, VNIILM, - Chairman, environmental-economic chamber; PEFC Russia, environmental-economic chamber; "Khabarovsk Forest Certification Centre" – social-economic chamber; Forest industry - Metsa group, environmental-economic chamber; Forest industry "MM-Efimovsky", environmental-economic chamber. The working group was established and it consist of 5 members representing limited interests.
4.4 The working group/committee shall:			
	Procedures	YES	3 Working group regulations
			«Membership in the WG is voluntary, opened for all stakeholders and cannot be declined»
			Complies
a) be accessible to materially and directly affected stakeholders,			Earlier Annex 4 Forum Statutes Ch 5 and Annex 13 Rules of Standard Development Ch 4.1 complied with the requirement

YES

Process

PEFC Russia has a comprehensive list of stakeholders interested in forest

- federal and regional forest management authorities and their key affiliates and

management. This list includes 188 stakeholders representing:

subordinate organizations;

Question	Assess. basis*	YES /NO*	Reference to application documents
			 trade unions of forestry sector; public labour inspections of the subjects of the Russian Federation; federal and regional executive authorities responsible for establishment and preservation of specially protected natural areas; scientific organizations addressed to the issues of biodiversity and ecologic functions of forests; preserves and national parks (the ones that deal with conservation-oriented researches and/or development of related offers); educational organizations (universities, institutes, academies) (the ones that conduct respective researches); environmental and social NGO; organizations of local population and indigenous peoples (communities, unions, associations); certified enterprises purchasing forest products beyond the boundaries of their leasehold; timber industry holdings and banks acting as investors and buyers of forest products; consultants in the sphere of certification (in case they are not involved into the process of preparation for certification); local administrations etc. Information and invitations to participate in the WG have been placed at website www.pefc.ru and sent to identified stakeholders via e-mail in accordance with "The list of stakeholders for standard PEFC-RUSSIA-ST-01-2015 discussion" and requirements of the document «Technical Working Group Regulations». According to PEFC Russia they have also used other sources of information dissemination, namely: telephone calls and verbal invitations to participate in standard review, WG and discussion of the final version of standard; personal meetings; conferences and workshops.

Question	Assess. basis*	YES /NO*	Reference to application documents
			To encourage participation of a larger number of stakeholders PEFC Russia system was reregistered in the Ministry of Justice of the Russian Federation (2013) and in the Federal Agency on Technical Regulating and Metrology ("Rosstandart") (2015) and was included into the Technical Committee Nr. 449 "Forestry and related activities" for the development of national forest management and use standard.
			All stakeholders have had a chance to join the WG, however only 5 of them did. Working group members included (interest category presented in brackets by Indufor): (Order NPP CDFC.doc (2012)
			 Non-Profit Partnership "Centre for Development of Forest Certification"; ORDER No. 29 A working group on updating PEFC-FCR-01-2014 "Forest management and use standard" shall be created composed of: Prokazin Nikolay, VNIILM, - Chairman, environmental-economic chamber; (research) Ryzhkov Andrey, PEFC Russia, environmental-economic chamber; (certification) Zakharenkov Andrey, "Khabarovsk Forest Certification Centre" – social-economic chamber; (certification) Chirkov Grigory, Metsa group, environmental-economic chamber; (industry) Bushkovsky Alexander, "MM-Efimovsky", environmental-economic chamber; (industry)
			Director of NP "Centre for Development of Forest Certification Ryzhkov A.E.; 30.10.2012
			Complies
	Procedures	YES	2 Standard setting rules (2015) «5. Rules for standard review, 5.1 Organization of standard review

Question	Assess. basis*	YES /NO*	Reference to application documents
			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 standard setting.»
			Information and invitations to participate in the WG are placed at website www.pefc.ru and sent to stakeholders in accordance with "The list of stakeholders for standard PEFC-RUSSIA-ST-01-2015 discussion".
			WG participants list is prepared in accordance with the amount and contents of standard review and participants' desire to take part in WG.
			In earlier documentation Rules of Standard Development (Annex 13)required balanced representation
b) have balanced representation and decision-making by stakeholder categories relevant to the subject		YES	13 The list of stakeholders to receive PEFC-RUSSIA-ST-01-2015 standard
matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process, and	Process		The results of review of comments and suggestions (attached in file) (includes 188 different stakeholders)
			Information and invitations to participate in the WG are placed at website www.pefc.ru and sent to stakeholders in accordance with "The list of stakeholders for standard PEFC-RUSSIA-ST-01-2014 discussion".
			WG participants list is prepared in accordance with the amount and contents of standard review and participants' desire to take part in WG.
			A balanced set of stakeholders has been involved in the standard setting and consultations. However, it is not fully clear how balanced have been a set of stakeholders, who drafted the first version of the standard.
			Complies

Question	Assess. basis*	YES /NO*	Reference to application documents
	Procedures	YES	3 Working group regulations. The WG shall consist of qualified experts. WG decides on the composition of its members but basically access to the working group cannot be declined.
			Does not require participation of affected stakeholders.
			Previous rules were defined in Rules for standard setting, review and approval, sec. 5
		YES	Information and invitations to participate in the WG are placed at website www.pefc.ru and sent to stakeholders.
			PEFC Russia informed that Invitations to participate in WG are sent in accordance with "The list of stakeholders (see Appendix 13) for standard PEFC-RUSSIA-ST-01-2014 discussion", however there is no evidence on that.
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. Process			WG participants list is prepared in accordance with the amount and contents of standard review and participants' desire to take part in WG.
	Process		 12 Working group members: Order NPP CDFC list of Working group members Non-Profit Partnership "Centre for Development of Forest Certification" A working group on updating PEFC-FCR-01-2014 "Forest management and use standard" shall be created composed of: Prokazin Nikolay, VNIILM, - Chairman, environmental-economic chamber; research Ryzhkov Andrey, PEFC Russia, environmental-economic chamber; certification
			 Zakharenkov Andrey, "Khabarovsk Forest Certification Centre" – social-economic chamber; certification Chirkov Grigory, Metsa group, environmental-economic chamber; Bushkovsky Alexander, "MM-Efimovsky", environmental-economic chamber. industry
			- Director of NP "Centre for Development of Forest Certification Ryzhkov A.E. 30.10.2012
			Two participants of the 5 member are materially affected. On the scale of Russian nation and the identified 188 interest groups the representativeness in view of

Question	Assess. basis*	YES /NO*	Reference to application documents
			expertise and influence in the standard implementation is very low. However, within the limits of the small WG materially affected stakeholders have a representation in decision making.
			Complies.
		YES	1 System regulations - «2.2 System administration, 2.2.1 Central Body of PEFC Russia system
			b) determines the structure of PEC RUSSIA system, establishes divisions: Appeals Commissions; methodological centre; registration division and sets the rules of procedure and management;»
	Procedures		4 Appeals procedures - «4. Objectives and functions of Appeals Commission
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.			4.1 The main objective of Appeals Commission is handling appeals (complaints, claims) related to the activity of System participants (except certification and accreditation bodies), the forest management standard setting and revision procedures, interpretation of forest certification standards and PEFC logo use.»
			2 Standard setting rules – 4.2.1 «In case of disputes concerning the standard stakeholder may appeal to the Working Group, Appeals Commission or PEFC RUSSIA and ask to organize a meeting with the representatives of all stakeholders for elimination of these disputes.»
			Current procedures comply with PEFC
Process			Earlier document Annex 3 Appeals Commission did not comply
	n/a	No appeals were received in the process of standard revision.	

Question	Assess. basis*	YES /NO*	Reference to application documents
a) acknowledge receipt of the complaint to the complainant,	Procedures	YES	 4 Appeals procedures - 4.2 Appeals Commission shall perform the following functions: a) registration of incoming appeals (informing the submitter of the appeal about it). The representative of the system – Appeals Commission, i.5.1 b.a member in PEFC Russia is the contact person who is always available and ready to discuss any issues related to standard review (contact data is placed at website <u>www.pefc.ru</u>). Procedure complies and was in use during the standard setting (see earlier document Annex 3 Appeals Commission did not comply)
	Process	n/a	No appeals have been received.
b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint, and	Procedures	YES	 4 Appeals procedures - «6.1. Appeals Commission shall: a) make decisions on appeals within its authority; b) request for and receive information from federal executive bodies, other institutions collaborating with PEFC Russia system, necessary for unbiased handling of appeals; c) request for and receive information from PEFC Russia system participants necessary for unbiased handling of appeals; d) engage experts competent in the matters addressed in the appeals handling process; … 6.2 Appeals Commission shall: c) ensure that the appeals handling process is impartial;» Procedure complies as did the earlier appeals procedures described in Annex 3 Appeals Commission 6
	Process	n.a	No appeals were received.

Question	Assess. basis*	YES /NO*	Reference to application documents
c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	Procedures	YES	 4 Appeals procedures - 4.2. Appeals Commission shall perform the following functions: d) notification of the submitters of the appeals and stakeholders about the decisions taken on their appeals; Procedure complies as did the earlier appeals procedures described in Annex 3 Appeals Commission 6
	Process	n.a	No appeals have been received.
4.6 The standardising body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	Procedures	YES	 4 Appeals procedures - «5. Structure of Appeals Commission 5.1 Appeals Commission shall include: b) one member representing PEFC Russia system, acting as a contact person for processing requests and claims related to standard setting procedure. The contact person shall always be accessible.» Procedure complies as did the earlier appeals procedures described in Annex 3 Appeals Commission 5
	Si	tandard	I-setting process
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	YES	 2 Standard setting rules - «4. Rules for new standards setting and approval 4.1 Organization of a new standard setting: PEFC RUSSIA shall identify stakeholders relevant to the objectives and scope of the standard setting work. Working Group Regulations: Membership in the WG is voluntary, open for all stakeholders and cannot be declined Procedure complies

Question	Assess. basis*	YES /NO*	Reference to application documents
			Earlier Rules of Standard Development (Annex 13) did not require identification of relevant stakeholders prior to revision.
	Process	YES	14 Appendix 5 stakeholder list <i>PEFC Russia identified a broad list of stakeholders</i> <i>Complies</i>
5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.	Procedures	YES	 2 Standard setting rules - «4. Rules for new standards setting and approval 4.1 Organization of a new standard setting PEFC RUSSIA shall identify disadvantaged and key stakeholders on the basis of constraint of their participation and proactively seek their participation and contribution in standard setting activities.» Procedure complies. Copy of PEFC requirement. Earlier Rules of Standard Development (Annex 13) did not require identification of disadvantaged stakeholders
	Process	NO minor NC	 13 The list of stakeholders to receive PEFC-RUSSIA-ST-01-2015 standard A number of disadvantaged and key stakeholders have been identified and contacted by email. The following stakeholders have been identified as the key stakeholders: federal and regional forest management authorities and their key affiliates and subordinate organizations; trade unions of forestry sector; federal and regional executive authorities responsible for establishment and preservation of specially protected natural areas;

Question	Assess. basis*	YES /NO*	Reference to application documents
			- timber industry holdings and banks acting as investors and buyers of forest products.
			Disadvantaged stakeholders included:
			 Association of indigenous and small-numbered peoples of North, Siberia and Far East Association of indigenous small-numbered peoples of the North of the Republic of Buryatia Regional Association of public organizations of indigenous small-numbered peoples of the North of Krasnoyarsk region Association of small-numbered indigenous peoples of Irkutsk region Association of indigenous small-numbered peoples of the North of Primorsk Territory Community of indigenous small-numbered peoples "Tigr" Association of indigenous small-numbered peoples of the North of Khabarovsk Territory Association of indigenous small-numbered peoples of the North of Amurskaya region.
			standard-setting activities.
			Non-compliant.
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	 2 Standard setting rules – «4. Rules for new standards setting and approval 4.1 Organization of a new standard setting or 5.1 review PEFC RUSSIA shall make a public announcement at its website (www.pefc.ru) and other relevant mass media of the start of the standard setting process and include an invitation for participation in a timely manner to afford stakeholders an opportunity for meaningful contributions» Complies. The text is a copy of the PEFC requirement, but gives some specifications how to implement it in Russia.

Question	Assess. basis*	YES /NO*	Reference to application documents
	Process	YES	The information was published at website <u>www.pefc.ru</u> in January 2012. A stakeholder seminar held in Khabarovs at the end of 2012 informed about standard revision to different types of stakeholders mainly operating in the region. About ten different stakeholders participated. In January an invitation on participation was sent out and in summer 2013 stakeholders were invited to <u>comment draft standard</u> . The screenshot of various stakeholders to whom the invitation was sent demonstrates that it was sent to a number of stakeholders, although those the mailing list is not consistent with the list of 188 interest group identified in stakeholder mapping. The screenshot presented was not made available for the assessment before June 2015. Complies.
5.3 The announcement and invitation shall include:			
a) information about the objectives, scope and the steps of the standard-setting process and its timetable,	Procedures	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval 4.1 Organization of a new standard setting or 5.1 review PEFC RUSSIA shall make a public announcement at its website (www.pefc.ru) and other relevant mass media of the start of the standard setting process and include an invitation for participation in a timely manner to afford stakeholders an opportunity for meaningful contributions» The text is a copy of the PEFC requirement. Complies
	Process	YES	The information was published at website <u>www.pefc.ru</u> in January 2012. A stakeholder seminar held in Khabarovsk at the end of 2012 informed about

Question	Assess. basis*	YES /NO*	Reference to application documents
			 standard revision to different types of stakeholders mainly operating in the region. About ten different stakeholders participated. In January an invitation on participation was sent out and in summer 2013 stakeholders were invited to comment draft standard. The mail screenshot provided by PEFC Russia in the course of the assessment demonstrates that invitations were sent to a range of stakeholders in addition to its dissemination in the regional seminar.

Question	Assess. basis*	YES /NO*	Reference to application documents
			Province for the formal formation of the formation of the second and secon
b) information about opportunities for stakeholders to participate in the process,	Procedures	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1 for standard revision The announcement and invitation shall include:

Question	Assess. basis*	YES /NO*	Reference to application documents
			 (b) information on opportunities for stakeholders to participate in the process, Procedure is a copy of PEFC requirement – being a detailed requirement a copied text complies. Earlier documentation did not set requirements on the content of invitation
	Process	NO minor NC	An invitation for participation in the standard revision was placed on the website of PEFC Russia on January 1, 2012. However, the invitation has not been presented in a clear format asking for participation in standard drafting and it does not comply with the detailed content required by the PEFC Council and FCR procedures. Non-compliant.
(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	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1 on standard review The announcement and invitation shall include: (d) 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» Note that the standard setting documents applicable in 2012-2014 (Annex 13) did not include the requirements. However, the procedures are assessed against the documents submitted after the interruption in March 2015. Complies.
	Process	NO	Non-compliant. The invitations requested to comment draft standard within the given 2 month periods. They did not give a comprehensive schedule on the planned

Question	Assess. basis*	YES /NO*	Reference to application documents
		minor NC	standard revision procedures Information was sent via e-mail. Information is available at website <u>www.pefc.ru</u> .
d) an invitation to comment on the scope and the standard-setting process, and Process	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1 on standard review The announcement and invitation shall include: (c) an invitation to comment on the scope and the standard-setting process, and» Earlier standard setting requirements (Annex 13) did not require the information in the invitation Complies. 	
	Process	NO minor NC	Non-compliant. The invitations requested to comment draft standard within the given 2 month periods. They did not give a comprehensive schedule on the planned standard revision procedures Information was sent via e-mail. Information is available at website <u>www.pefc.ru</u> .
e) reference to publicly available standard-setting procedures.	Procedures	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1 on standard review PEFC RUSSIA shall make a public announcement at its website (www.pefc.ru) and other relevant mass media of the start of the standard setting process and include an invitation for participation in a timely manner to afford stakeholders an opportunity for meaningful contributions. The announcement and invitation shall include: (e) reference to publicly available standard-setting.

Question	Assess. basis*	YES /NO*	Reference to application documents
			 Q 5.3.e asks for public availability and PEFC Russia specifies in many contexts that PEFC Russia website is the primary publication channel which is complying evidence to this question. Procedure is a copy of PEFC requirement. Complies because it specifies that the information is publicly available at PEFC Russia website.
	Process	YES	Information on PEFC requirements and standard setting on PEFC Russia web site included description of the standard setting rules in 2012, which is considered as adequate media for publication along with the 1-2 regional seminars. Note that the published standard setting rules in 2012 were not explicit on the invitation to participate in standard setting. Updated rules were available in March 2015 (see Q 5.3 b) Complies
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	 2 Standard setting rules - 4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1. Standard revision The announcement and invitation shall include: a) information about the objectives, scope and the steps of the standard setting process and standard setting schedule, (c) an invitation to comment on the scope and the standard-setting process, 2 Standard setting rules - «4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1 Standard review PEFC RUSSIA may review the standard setting process based on comments received after publication of the announcement and adjust the composition of Working Group 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 standard setting »

Question	Assess. basis*	YES /NO*	Reference to application documents
			Earlier documentation (Annex 4 Forum Statutes, Annex 13 Rules of Standard Development) valid during standard revision did not require Annex 13 Rules of Standard Development review of the process prior to its implementation Conclusion: the procedures valid during standard revision did not require consultation on standard setting procedures. The current procedures are identical to PEFC requirements and will comply in the future standard setting processes.
	Process	n.a.	
5.5 The work of the working group/committee shall be or	ganised in an op	ben and	transparent manner where:
a) <u>working drafts</u> shall be <u>available to all members</u> of the working group/committee,	Procedures	NO minor NC	 3 Working group regulations - Activities All decisions are made based on consensus; <u>The Working group procedures do not specifically require transparency in information sharing within the working group</u>. On the other hand a consensus decision is required. In earlier Forum Statutes ch 8 TRANSPARENCY states The Forum operation shall be completely transparent. All documents relating to the development of FCR forest management standard and minutes of Forum meetings shall be presented on request to any stakeholder. Non-compliant.
	Process	YES	The great majority of the members in the small working group were content with the material they had access to. However, the standard setting procedures were not clear to all members as well as the consideration of comments received.
	Procedures	YES	3 Working group regulations - «Obligations.

Question	Assess. basis*	YES /NO*	Reference to application documents
b) all members of the working group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts, and	Process	YES	 The WG shall perform its activities in accordance with these Regulations, PEFC RUSSIA System Regulation and Rules for standards setting, review and approval. The WG shall inform stakeholders and disadvantaged parties on the process of the standard setting». Activities – All decisions of the WG are taken on the basis of consensus and agreed priorities. <i>Complies.</i> Questionnaire to working group members demonstrated that WG members had the possibility to give comments to the drafts, which, however, were not always taken into consideration WG minutes during the standard revision in 2013-2014 were not available, the minutes of telephone meetings in 2015 during the finalization of the standard record the title and parties involved in the discussion. Note that the standard finalization took place during the PEFC endorsement assessment.
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	NO minor NC	 3 Working group regulations– «Activities. Meetings of the WG are headed by a Chairman elected from members of the WG. All decisions of the WG are taken on the basis of consensus and agreed priorities. Earlier standard setting procedures (Annex 4 and Annex 13) required that all signed comments are recorded. Non-compliant. Not clearly defined how the WG member comments shall be discussed and decided on. On the other hand a consensus decision is required. The WG regulations for the 5 member group lack description of decision making procedures and related consideration of different views. Recording of WG meetings should be improved.

Question	Assess. basis*	YES /NO*	Reference to application documents
	Process	YES	The Working group considered each comment received on October 23.2013 and published the comments and outcome in Internet <u>www.pefc.ru</u>
5.6 The standardising body shall organise a public const	ultation on the er	nquiry di	raft and shall ensure that:
5.6 The standardising body shall organise a public consultation on the organise all public consultation is announced in a timely manner in suitable media, Procedures Process Process	Procedures	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1 Standard revision PEFC RUSSIA shall organize public consultation on the enquiry draft and shall ensure that: (a) the beginning and the end of the public consultation is announced in a timely manner in suitable media, (b) the invitation of disadvantaged and key stakeholders shall be made by means ensuring that information reaches its recipient and is understandable, (c) the enquiry draft is publicly available and accessible, (d) public consultation lasts not less than 60 days, (e) all comments received are considered by the Working Group/committee in an objective manner, (f) a synopsis of received comments compiled from material issues including the results of their consideration is publicly available on PEFC RUSSIA website (www.pefc.ru).»
	Process	YES	 The first consultation was held in summer 2013. Exact dates are not informed. The invitation was placed on Internet with the specification that only signed comments with authors identification information are taken into consideration. In November 1 2013, the Working group asked for minor technical comments to be given to the final version of the standard PEFC-FCR-ST-01-2014. The comments were to be given by December 31, 2013

Question	Assess. basis*	YES /NO*	Reference to application documents
			 Third consultation was held from November 20, 2014 to January 20, 2015 for the final standard of the year 2015. The consultations were informed in Internet and in stakeholder seminars or meetings Note that the third PEFC conformity assessment was ongoing during the second consultation. Compliant
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	 2 Standard setting rules – «4. Rules for new standards setting and approval 4.1 Organization of a new standard setting PEFC RUSSIA shall organize public consultation on the enquiry draft and shall ensure that: (b) the invitation of disadvantaged and key stakeholders shall be made by means ensuring that information reaches its recipient and is understandable, » 5.1 Standard review. PEFC Russia shall identify disadvantaged and key stakeholders on the basis of constraint of their participant and proactively seek their participation and contribution in standard setting. <i>Complies. First part (4.1) is a copy of PEFC Requirement.</i>
	Process	YES	13 Stakeholder list lists comprehensively different stakeholders and the evidence shows that a range of disadvantaged and key stakeholders has been actively invited. <i>Complies</i>
c) the enquiry draft is publicly available and accessible,	Procedures	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval; 4.1 Organization of a new standard setting and 5.1 Standard review PEFC RUSSIA shall organize public consultation on the enquiry draft and shall

Question	Assess. basis*	YES /NO*	Reference to application documents
			ensure that: (c) the enquiry draft is publicly available and accessible,»
			Complies. Copy of PEFC Requirement. The System procedures should define how the draft shall be made publicly available. In practice it is placed on PEFC Russia web site. <u>www.pefc.ru</u>
		YES	The initiation of standard revision was announced in Internet in January, 2013 when also key stakeholders were contacted.
		ocess	The first consultation was announced in Internet in summer 2013 on the standard PEFC FCR-ST-01-2013, the dates of the consultation were not available for the assessment.
	Process		The second consultation on standard PEFC-FCR-ST-2014 was held on November 1 to December 31, 2014. This included only comments on "minor technical changes"
			And the third consultation on standard version PEFC-FCR-ST-2015 ended in January 20, 2015, during the endorsement assessment.
			Complies. The draft standards have been accessible at <u>www.pefc.ru</u> , as a link to invitation. However, all draft standards submitted to consultation should be available under the documentation folder.
d) the public consultation is for at least 60 days,	Procedures	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval, 4.1 Organization of a new standard setting and 5.1 Standard review PEFC RUSSIA shall organize public consultation on the enquiry draft and shall ensure that: (d) public consultation lasts not less than 60 days,»
			Complies. Copy of PEFC Requirement

Question	Assess. basis*	YES /NO*	Reference to application documents
	Process	YES	The second consultation held in November to December 2014 lasted 60 days. Informed in <u>www.pefc.ru</u>
	Procedures	YES	 2 Standard setting rules – «4. Rules for new standards setting and approval; 4.1 Organization of a new standard setting and 5.1 Standard review PEFC RUSSIA shall organize public consultation on the enquiry draft and shall ensure that: (e) all comments received are considered by the Working Group/committee in an objective manner,» Working group shall make all decisions in consensus. <i>Complies. Copy of PEFC Requirement.</i>
e) all comments received are considered by the working group/committee in an objective manner,	Process	YES	PEFC RU answer of 13 Sept. 2014: PEFC Russia (2 persons) addressed the comments and made the reformulations to the standards it deemed necessary. The changes were consulted in telephone conference Oct 23-25, 2014 with 3 other group members. WG claims to have a consensus decision, but objecting views were also presented by the parties No records on the telephone conferences of year 2014. Available records are from
	FIUCESS		 the year 2015. 16 Consideration of stakeholder comments records on working group decisions on comments received in third consultation in January 2015. <i>WG reported on the consideration of the comments.</i> <i>Complies.</i>
	Procedures	YES	2 Standard setting rules – «4. Rules for new standards setting and approval 4.1 Organization of a new standard setting; and 5.1 Standard review

Question	Assess. basis*	YES /NO*	Reference to application documents
(f) a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.			 PEFC RUSSIA shall organize public consultation on the enquiry draft and shall ensure that: (f) a synopsis of received comments compiled from material issues including the results of their consideration is publicly available on PEFC RUSSIA website (www.pefc.ru).» Copy of PEFC Requirement. Complies. Earlier documentation Annex 13 Rules of Standard Development required that the List of written comments of the stakeholders shall be accessible for the stakeholders, in web in practice.
	Process	YES	Synopsis of the comments and their consideration is available for one consultation (see Summary of remarks to standard proposal (Document 17).
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing	Procedures	YES	2 Standard setting rules New documentation of 2015 require pilot testing for new standards. Complies
shall be considered by the working group/committee.	Process	n.a	Standard PEFC-Russia-ST-01-2015 is not a new standard. Pilot testing shall be organized only for new standards.
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	3 Working group regulations – «Activities. All decisions of the WG are taken on the basis of consensus and agreed priorities. <i>Complies</i>
	Process	YES	 WG minutes of meetings are from year 2015. They record the participants of the meeting and the venue, not any details on discussions. 14 Questionnaire replies demonstrated that the small working group of 5 persons reached a consensus.

Question	Assess. basis*	YES /NO*	Reference to application documents
			Complies
5.8 In order to reach a consensus the working group/cor	nmittee can utilis	se the fo	llowing 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	 2 Standard setting rules - «4.3 Preparation of the third (final) version of a new standard and its approval In order to reach a consensus the Working Group/Committee can use the following alternative ways to establish the 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.,» Complies Copy of PEFC requirement.
	Process	n.a	No evidence on any face to face meetings or voting in the decision-making stage
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures	YES	 2 Standard setting rules - «4.3 Preparation of the third (final) version of a new standard and its approval In order to reach a consensus the Working Group/Committee can use the following alternative ways to establish the opposition: (b) a telephone conference meeting where there is a verbal yes/no vote, » Complies Copy of PEFC requirement.
	Process	YES	Telephone conference meetings were held between 2-3 working group members at a time. Records are from 2015. No evidence on voting.
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	 2 Standard setting rules - «4.3 Preparation of the third (final) version of a new standard and its approval In order to reach a consensus the Working Group/Committee can use the following alternative ways to establish the opposition: (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), »

Question	Assess. basis*	YES /NO*	Reference to application documents			
			Copy of PEFC requirement. Complies			
	Process	n.a.	No evidence on any email meetings or voting in the decision-making stage			
d) combinations thereof.	Procedures	YES	 2 Standard setting rules - «4.3 Preparation of the third (final) version of a new standard and its approval In order to reach a consensus the Working Group/Committee can use the following alternative ways to establish the opposition: (d) combinations thereof.» Copy of PEFC requirement. Complies 			
	Process	YES	Telephone meetings were held and seminars/workshops			
5.9 In the case of a negative vote which represents sust shall be resolved using the following mechanism(s):	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	 2 Standard setting rules - «4.3 Preparation of the third (final) version of a new standard and its approval 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):			
	Process	n.a	No disputed issues have arisen.			

Question	Assess. basis*	YES /NO*	Reference to application documents
b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,	Procedures	YES	 2 Standard setting rules - «4.3 Preparation of the third (final) version of a new standard and its approval 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): (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.» Copy of PEFC requirement. Complies because the PEFC requirement is explicit and does not require additional specifications for national application.
	Process	n.a	No disputed issues have arisen.
c) dispute resolution process.	Procedures	YES	 2 Standard setting rules – «4.3 Preparation of the third (final) version of a new standard and its approval 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): (c) dispute resolution procedure in accordance with the Regulation on Appeals Commission of PEFC RUSSIA System,» 4 Appeals procedures REGULATIONS ON APPEALS COMMISSION OF PEFC RUSSIA SYSTEM Complies
	Process	n.a	No disputed issues were raised.
	Procedures	YES	 2 Standard setting rules «4. Rules for new standards setting and approval; 4.2 Setting of I version: WG shall ensure access to the draft standard (first) for all stakeholders 4.1 Organization of a new standard setting and Rules for standard review

Question	Assess. basis*	YES /NO*	Reference to application documents
5.10 <u>Documentation</u> on the implementation of the <u>standard-setting process shall be made publicly</u> <u>available</u> .			 e) reference to publicly available standard-setting.» 5.1 Standard review – PEFC Russia shall make a public announcement at its website and other relevant mass media of the start of the standard setting process The announcement and invitation shall include e) reference to publicly available standard-setting PEFC Russia may review the standard setting process based on comments received after publication of the announcement. Complies. Copy of the PEFC requirement. The relevant mass media and publicity of standard setting/revision procedures and relevant records (minutes, etc.) should be defined in more detail to ensure good adaptation at a national level Earlier documentation valid during standard revision (Annex 13) states: Working group shall ensure the access to the standard's project for all interested parties. For this purpose, it may be published on RN FCC website (www.fcr.ru) on the Internet.
	Process	YES	Standard setting rules were placed in Internet (pefc.ru) in 2012 attached to an announcement. Information on the public availability of the minutes is not given. Selected few minutes were made available to the assessor.
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	 2 Standard setting rules «3. General provisions Standards shall be developed and approved in the following order: e) preparation of the standard for approval, standard approval, registration, publication and entry into force. 3 Working group regulations – Activities All decisions of the WG are taken on the basis of consensus and agreed priorities. documents adopted by WG shall be forwarded to PEFC Russia for their approval

Question	Assess. basis*	YES /NO*	Reference to application documents	
			1 System regulations . 2.2.1 PEFC Russia d) considers and approves PEFC Russia regulatory documents	
	Process	YES	Complies The standard was adopted, protocols # 1 and 2 as of 2015 were signed by the members of the working group NP "CDFC" – PEFC Russia. Standards are available at website www.pefc.ru. Complies	
	Procedures	YES	 2 Standard setting rules «The information about the approved amendment to the standard and the text of amendment shall be published in the mass media and at PEFC RUSSIA website (www.pefc.ru) in the Internet.» 1 System regulation (Ch 8. Stakeholders can get the information on system documentation at website or on request sent to PEFC Russia«8. <i>Complies</i> 	
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Process	YES	www.pefc.ru On the 24 th of February, 2015, Standard and other documents were placed at website www.pefc.ru. Note that the standards were not placed in Internet in a timely manner right after the approval in 2014 when the endorsement assessment started, thus the system regulations were not fully complied with Currently complies	
Revisions of standards/normative documents				

Question	Assess. basis*	YES /NO*	Reference to application 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	 2 Standard setting rules «8. Standards/normative documents revision 8.1 Standards/normative documents shall be revised and corrected at least once in five years. The procedure for standards/normative documents revision shall comply with the procedure specified in section 5.» 5.1 Organization of standard review – PEFC Russia shall be the initiator of standard review 1 System regulation 2.2.1 PEFC Russia i) initiates regular (at least once in 5 years) revision of documents and system registration <i>Complies</i>
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	Process	YES	 1 System regulation- «8. Standards/normative documents revision. 8.2 Effective date and expiry date of standards/normative documents transition period shall be specified in the process of their revision.» 8.3 Standard shall come into effect not later than one year from the date of its publication PEFC Council informed that when the standards are approved in PEFCC, PEFC Russia shall issue an order on the effective and expiry dates of transition period for revised standards/normative documents. <i>Complies.</i>
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	 1 System regulation— «8. Standards/normative documents revision. 8.3 Standard shall come into effect not later than one year from the date of its publication. It is necessary for the approval of revised standards/normative documents including corrections, distribution of information and training.» When the standards are approved in PEFCC, PEFC Russia shall issue an order on the effective and expiry dates of transition period for revised standards/normative documents. The effective date shall be not less than one year from the date of standard publication.

Question	Assess. basis*	YES /NO*	Reference to application documents
			System requirements comply. Evidence on practical implementation is not yet available.
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	 1 System regulation- «8. Standards/normative documents revision. 8.4 Transition period shall last not more than one year but for reasonable exceptional cases when standards/normative documents revision takes more time.» «5.2 Development of amendments to the national standard. The amendment to the standard shall become effective at least three months after its approval (adoption) taking into account the time required for proper administration.»
			System requirements comply. Evidence on practical implementation is not yet available

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

2 Checklist

Question	YES / NO*	Reference to system documentation					
	General						
4.1 Does the forest certification scheme provide clear definition of PEFC ST 1002:2010:	4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:						
a) the group organisation,	YES	 English translation of 1 System regulation (August 2015) « 3.1.2 Group Certification Note (in accordance with PEFC ST 1002:2010): Definition: Group organization 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 organization" is equivalent to the term "region" or other terms chosen by the relevant forest certification scheme and complying with the content of this definition. Joint certification Certification of group members that have signed a commitment to join a group. Territorial certification (regional) Land leaseholders within an area of one lesnichestvo that sign a declaration for group certification. The definition of group organization is a copy of PEFCC definition 3.5. The Russian PEFC System includes territorial and joint group certification. Group organization in both arrangements are based on voluntarily signed commitment to join the group. 					

Question	YES / NO*	Reference to system documentation
		Complies
b) the group entity,	YES	 1 System regulation - « 3.1.2 Group Certification Group entity An entity that represents the participants, with overall responsibility for ensuring the conformity of forest management in the certified area to the sustainable forest management standard and other applicable requirements of the forest certification scheme. Note 1: The term "group entity" is equivalent to the term "regional/group applicant", etc. Joint certification Applicant is a group organization selected at a general meeting of forest users community Territorial certification (regional) The applicant of territorial certification is lesnichestvo (Federal administrative forest management unit in Russia) <i>The definition is a copy of PEFCC definition 3.2. Both types of group certifications have identified the group entity (applicant). Complies because the System specifies</i>
c) the participant,	YES	 the term's practical implementation in Russia. 1 System regulation - « 3.1.2 Group Certification, Note (in accordance with PEFC ST 1002:2010): Participant (member) A forest owner/manager or other entity covered by the group forest certificate, who has the legal right to manage the forest in a clearly defined forest area, and the ability to implement the requirements of the sustainable forest management standard in that area.

Question	YES / NO*	Reference to system documentation
		Note1: The term "ability to implement the requirements of the sustainable forest management standard" requires the entity to have a long-term legal right to manage the forest and would disqualify one-off contractors from becoming participants in group certification.
		The definition is a copy of PEFCC definition 3.6. In joint certification the participants are organisations that have leased from state the harvesting rights for a forest area for a specific time period. In territorial certification the participants are leaseholders and the state organization lestnichestvo that is the formal applicant.
		Complies. The participants are defined
		1 System regulation - « 3.1.2 Group Certification Note (in accordance with PEFC ST 1002:2010):
		Certified area
d) the certified area,	YES	The forest area covered by a group forest certificate representing the sum of forest areas of the participants .
		In Joint and territorial certifications the certificate covers forest areas managed by members who have signed the declaration. Only wood extracted from the area managed by the members is considered as certified (p. 11)
		The definition is a copy of PEFCC definition 3.1. Its implementation in the System complies.
e) the group forest certificate, and	YES	1 System regulation - « 3.1.2 Group Certification, Note (in accordance with PEFC ST 1002:2010):
		Group forest certificate

Question	YES / NO*	Reference to system documentation
		A document confirming that the group organization complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certification scheme.
		Note: The term "group forest certificate" is equivalent to the term "regional certificate" or other terms chosen by a relevant forest certification scheme which comply with the content of this definition.
		The definition is a copy of PEFCC definition 3.3.
		Complies
f) the document confirming participation in group forest certification.	YES	1 System regulation - «3.1.2 Group Certification
		Note (in accordance with PEFC ST 1002:2010):
		Document confirming participation in group forest certification
		A document issued to an individual participant that refers to the group forest certificate and that confirms the participant as being covered by the scope of the group forest certification .
		The definition is a copy of PEFCC definition 3.7.
		Complies
4.1. 2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or		1 System regulation - « 3. IMPLEMENTATION
individual forest management certifications, the scheme shall	YES	General provisions
ensure that non-conformity by the forest owner identified under <u>one forest management certification</u> is addressed in <u>any other forest management certification</u> that covers the forest owner. 2014-05-06		PEFC RUSSIA system allows some forest owners join additional group or be approved in individual forest management certification. Nonconformities identified in one certification scheme of a particular forest owner shall be considered as nonconformities in <u>any other forest management certification scheme</u> of this forest owner.»

Question	YES / NO*	Reference to system documentation
		Complies despite of the inaccuracy in the PEFC copied requirement.
		Copy of the earlier version of PEFCC checklist and standard. The PEFCC refers with "any other forest management certification" other certifications under the same PEFC System, here PEFC Russia. The Russian PEFC System requires that non conformities under any other schemes (PEFC/ FSC etc.) shall be taken into consideration.
		1 System regulation - 3.1.2 Group certification
		Group organization (entity) shall implement a <i>detailed list of requirements for group entity. The list requires implementation</i> of internal monitoring programme and its review.
		«Joint certification
4.1.3 The forest certification scheme shall define requirements for group forest certification which ensure that <u>participants' conformity with the sustainable forest</u> <u>management standard is centrally administered</u> and is subject to central <u>review</u> and that all participants shall be subject to the internal monitoring programme.	YES	 The applicant is forest user who is selected at a general meeting of forest users community, who assumes responsibilities of head organization of forest users community and is responsible for the following: 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
		Territorial certification (version 07.08.2015)
		Group organization (lesnichestvo) under territorial certification and members of territorial certification have the same functions and obligations as they would have under joint certification".
		Complies
4.1.4 The forest certification scheme shall define	YES	1 System regulation – 3.1.2
requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the		Group organization (entity) shall implement a <i>detailed list of requirements for group entity. The list requires</i> implementation of internal monitoring programme

Question	YES / NO*	Reference to system documentation
whole group organisation with the sustainable forest management standard.		 «Joint certification (version 07.08.2015) The applicant is forest user who is selected at a general meeting of forest users community, who assumes responsibilities of head organization of forest users community and is responsible for the following: 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 which shall include among others the following basic provisions: the objective and tasks of monitoring, appointment of people responsible for monitoring and their responsibilities, monitoring plan and schedule agreed by the members of group certification, the results of monitoring shall be summed up and analyzed, plan of corrective and preventive actions prepared on results of monitoring, control over the implementation of the plan of corrective and preventive actions, evaluation of taken corrective actions efficiency and its further consideration
Function	s and res	sponsibilities of the group entity
4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:		
a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;	YES	 1 System regulation «3.1.2. Group Certification Group organization shall comply with the following common requirements: (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;»

Question	YES / NO*	Reference to system documentation
		Complies. A copy of PEFCC requirement but the requirement is explicit and does not necessarily require System specific specifications.
b) To provide <u>a commitment</u> 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	 1 System regulation – «3.1.2. Group Certification Group organization shall comply with the following common requirements: (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;» Obligations for group entities in joint certification provides adequate evidence for such commitment. Territorial certification (version 07.08.2015) Group organization (lesnichestvo) under territorial certification and members of territorial certification have the same functions and obligations as they would have under joint certification".
		Complies
c) To establish written procedures for the management of the group organisation;	YES	 1 System regulation — «3.1.2. Group Certification Group organization shall comply with the following common requirements: (c) To establish written procedures for the management of the group organization;» Joint certification. Group entity shall implement internal rules for joint certification. Complies

Question	YES / NO*	Reference to system documentation
 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; 	YES	 1 System regulation – «3.1.2. Group Certification Group organization shall comply with the following common requirements: (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;» Joint certification. <i>Group entity</i> shall keep a register of members and certified area, to operate a review of conformity with SFM standardcorrective and preventive measures if required, annual internal audits of a compliance of each member (p. 11) <i>Complies</i>
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 <u>right of the group entity to implement and enforce any corrective or preventive measures</u> , and to <u>initiate the exclusion of any participant</u> from the scope of certification in the event of non-conformity with the sustainable forest management standard;	YES	 1 System regulation – «3.1.2. Group Certification Group organization shall comply with the following common requirements (p. 8): (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;» 3.1.2 Joint certification group entity is responsible for (p. 10)

Question	YES / NO*	Reference to system documentation
		- inclusion of members based on signed commitment through declaration, contract, or any other document providing evidence of being a member of a group entity.
		- 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 nonconformity with the sustainable forest management standard; (version 07.08.2015, p.10)
		 exclusion of members of joint certification 3.1.2 Territorial certification. members sign the declaration (p. 11)
		5 Membership commitment. Declaration of Membership in PEFC Group certification.
		, take required measures for improving sustainable forest management
		specifies the obligations of members, but does not define the rights of group entity to enforce corrective actions or specify conditions for exclusion of a member.
		Complies
		1 System regulation - «3.1.2. Group Certification
	YES	Group organization shall comply with the following common requirements (p.8):
		(f) To provide participants with a document confirming participation in the group forest certification;»
f) To provide participants with a document confirming		3.1.2 Joint certification group entity is responsible for (p. 10)
participation in the group forest certification;		- issuing of the testimonial (verified copy of certificate) of a member of joint certification
		In territorial certification the obligation is not specified. The general requirement for group organization applies.
		Complies. Copy of PEFC requirement. Requirement is explicit and do not require additional interpretation at a group organization level.
g) To provide all participants with information and guidance required for the effective implementation of the sustainable	YES	1 System regulation - «3.1.2. Group Certification

Question	YES / NO*	Reference to system documentation
forest management standard and other applicable requirements of the forest certification scheme;		Group organization shall comply with the following common requirements (p. 9):
requirements of the forest certification scheme,		(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;»
		Complies. Copy of PEFC requirement. The general requirements for group entity apply equally to joint and territorial certifications.
		1 System regulation - «3.1.2. Group Certification
		Group organization shall comply with the following common requirements (p. 9) and Joint certification (p. 10):
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;	YES	(h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;»
		3.1.2 Joint certification (p. 10)
		 annual internal audits on compliance of each member of a group entity with the indicators of PEFC Russia standard
		Complies
		1 System regulation - «3.1.2. Group Certification
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	Group organization shall comply with the following common requirements (p. 9) and Joint certification (p. 10):
		(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.»
		3.1.2 Joint certification (p.10)

Question	YES / NO*	Reference to system documentation
		 follow-up of corrective and preventive actions with regard to non-conformities identified during internal audits
		Complies. Copy of PEFC requirementThe general requirements for group entities apply to joint and territorial certifications
Funct	ion and r	esponsibilities of participants
4.3.1 The forest certification scheme shall define the following	requireme	ents for the participants:
		1 System regulation - «3.1.2. Group Certification
a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable	YES	The participants of group certification shall comply with the following common requirements (p. 9):
		(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;»
requirements of the forest certification scheme;		5 Membership commitment. Declaration of Membership in PEFC Group certification
		Complies. Copy of PEFC requirement. Both joint and territorial certifications specify that participants shall have signed a declaration of commitment and membership in the group.
	YES	1 System regulation - «3.1.2. Group Certification
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;		The participants of group certification shall comply with the following common requirements (p.9):
		(b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;»
		3.1.2 Joint certification (p. 11) responsibilities of members include
		- compliance with PEFC Russia system requirements and rules of joint certification
		- ensuring that members comply with standard requirements

Question	YES / NO*	Reference to system documentation
		5 Membership commitment. ,manage forests in accordance with the requirements of PEFC Russia system, take required measures for improving sustainable forest management
		Complies. General requirement is a copy from PEFC document that applies to joint and territorial certifications. Repeated with own expression in the member responsibilities of joint certification.
		1 System regulation - «3.1.2. Group Certification
	YES	The participants of group certification shall comply with the following common requirements (p. 9):
		(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; »
c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification		3.1.2 Joint certification (p. 11) responsibilities of members include
body for relevant data, documentation or other information;		- assistance in internal and external audits
allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise;		- provision of reliable data on managed forest areas
		5 Membership commitment allow representatives of certification bodies and group certification bodies perform audit activit5ies within forest areas
		Complies. General requirement is a copy from PEFC document that applies to joint and territorial certifications. Repeated with own expression in the member responsibilities of joint certification.
		Note that the responsibilities of parties in territorial certification are not defined in the English System regulation but more descriptions are available in Russian document version.
d) To implement relevant corrective and preventive actions established by the group entity.	YES	1 System regulation - «3.1.2. Group Certification

Question	YES / NO*	Reference to system documentation
		The participants of group certification shall comply with the following common requirements (p. 9):
		(d) To implement relevant corrective and preventive actions established by the group entity.»
		3.1.2 Joint certification (p. 11) responsibilities of members include
		 preparation of corrective and preventive measures based on the findings of internal and external audits
		Complies. General requirement is a copy from PEFC document that applies to joint and territorial certifications. Repeated with own expression in the member responsibilities of joint certification.

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

PEFC Russia has submitted two standards during the assessment. The PEFC-FCR-ST-01-2014 Forest Management and Use Standard was developed aligned with System standard setting procedures. The update submitted in March 2015, PEFC-RUSSIA-ST-01-2015 Forest Management Standard is completed by PEFC Russia. It includes mainly editorial changes and a few amendments that improve the compliance with PEFC requirements. The comparison of the two standard versions is presented in Appendix 2.

The assessment is made against the standard version of 2015 (document 6 FM standard).

2 Checklist

Question	YES / NO*	Reference to scheme documentation
Gen	eral requ	irements for SFM standards
4.1 The requirements for sustainable forest management defin	ied by reg	ional, 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	Complies. The PEFC-RUSSIA-ST-01-2015 standard includes management and performance requirements applicable at a forest management unit level.
b) be clear, objective-based and auditable.	YES	Complies The PEFC-RUSSIA-ST-01-2015 standard has criteria and indicators that are clear, often referring to legislation as the source of specific requirement. They are objective based and suitable for auditing.
c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.	YES	 PEFC-RUSSIA-ST-01-2015 Principle 3. Rational and efficient forest management. Criterion 3.1. Management and economic activity of the applicant shall be conducted in accordance with principles of sustainable forest management 3.1.1. A declaration of commitment to principles and criteria of sustainable forest management is available. 3.1.3 The applicant shall clarify the principles and criteria of sustainable forest management to the applicant's workers, subcontractors and forest users. 2.4.1. Annual monitoring of condition of forest stand, volumes and intensity of forest

Question	YES / NO*	Reference to scheme documentation		
d) require record keeping that provides evidence of compliance with the requirements of the forest management standards.	YES	 management is conducted. Complies. The standard is applicable in different types of forests on the Russian Federation. The main parties applying for a certificate and implementing the criteria are leaseholders and their contractors, most often private companies. In forest management planning state organizations are in a key role, and they operate aligned with legislation. Thus it is essential that the standard is well integrated with relevant legislation. PEFC-RUSSIA-ST-01-2015 Principle 2. Planning of operations and monitoring of forest management C2.5 Appropriate methods of monitoring shall be used to ensure comparable results and assessment of changes 2.5.5. Records and/or reports on forest monitoring and operating control are in place. 		
Complies Specific requirements for SFM standards Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle				
5.1.1 Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of the economic, ecological, cultural and social 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.	YES	PEFC-RUSSIA-ST-01-2015 Criterion 2.1. Forest management shall be planned in accordance with the principles and criteria of sustainable forest management 2.1.2. The forest management plans shall aim to maintain or strengthen the forests and other lands under forest and to improve the quality of economic, environmental, cultural and social values of forest resources including soil water resources using a full range of relevant services and tools helping to plan the land use and nature conservation. <i>Complies.</i>		
5.1.2 Forest management shall comprise <u>the cycle of</u> <u>inventory and planning, implementation, monitoring</u> and evaluation, and shall include an appropriate <u>assessment of</u> <u>the social, environmental and economic impacts</u> of forest	YES	PEFC-RUSSIA-ST-01-2015 Principle 2. Planning of operations and monitoring of forest management Criterion 2.1. Forest management shall be planned in accordance with the		

Question	YES / NO*	Reference to scheme documentation
management operations. This shall form a basis for a cycle of		principles and criteria of sustainable forest management
continuous improvement to minimise or avoid negative impacts.		2.1.5. The forest management plans shall include: a cycle composed of <u>inventory</u> , <u>planning</u> , <u>implementation</u> , <u>monitoring</u> and assessment as well as relevant assessment of social, environmental and economic impact of forestry operations.
		Criterion 2.2. <u>Economic feasibility</u> (efficiency) of planned operations shall be ensured in view of market.
		Criterion 2.3. Assessment and coordination of all planning procedures regulating forest management shall be conducted <u>according to legislation</u> .
		Criterion 2.4. <u>Timely monitoring</u> of forest resources and forest management assessment shall be ensured, its results shall be considered during the planning process.
		Criterion 2.5. Appropriate methods of monitoring shall be used to ensure comparable results and assessment of changes.
		Criterion 2.6. Revision of short-, medium- and long-term plans shall be carried out based on monitoring results.
		Complies.
		PEFC-RUSSIA-ST-01-2015
		Principle 2. Planning of operations and monitoring of forest management
	YES	C2.1 Forest management and use shall be planned in accordance with the principles and criteria of sustainable forest management
5.1.3 <u>Inventory and mapping of forest resources shall be</u> <u>established</u> and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.		2.1.7. The scale of forest resources inventory and mapping shall correspond to the local and national conditions
		2.1.12. The forest management plan shall be composed of the following sections:
		 h) environmental measures; i) plans to identify and protect rare and endangered species as well as species included in the federal and regional Red List Books of flora and fauna species; j) maps depicting the main forest resources including protected areas and planned forestry operations as well as land title;

Question	YES / NO*	Reference to scheme documentation
5.1.4 Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They shall be based on legislation as well as existing land-use plans, and adequately cover the forest resources.	YES	 k) measures to preserve and maintain protective forests and specially protected forest areas; I) measures to preserve and enhance the biological diversity; o) measures to exercise the rights and guarantees of workers and local population. <i>Complies</i> PEFC-RUSSIA-ST-01-2015 Principle 2. Planning of operations and monitoring of forest management Criterion 2.1. Forest management shall be planned in accordance with the principles and criteria of sustainable forest management 2.1.8. The forest management plans are worked out and updated regularly in accordance with the current legislation, existing land and forest use plan for the forest plot 2.1.12. The forest management plan shall be composed <i>Complies</i>
5.1.5 Management plans or their equivalents shall include at least a description of the <u>current condition of the forest</u> management unit, long-term <u>objectives</u> ; and the average <u>annual allowable cut</u> , including its justification and, where relevant, the annually <u>allowable exploitation of non-timber forest products</u> .	YES	 PEFC-RUSSIA-ST-01-2015 Principle 2. Planning of operations and monitoring of forest management. 2.1.12. The forest management plan shall be composed of the following sections: a) description of <u>current condition of the forest management unit;</u> b) long-term <u>goals</u> of forest management; c) description of used forest resources, environmental restrictions, regulation on land use and title, socio-economic conditions, as well as information about adjacent lands; d) location of forest resources including protected species and SPA boundaries; e) planned forestry operations; f) <u>annual allowable cut</u> and selection of species to be harvested including justification of the acceptable volume of harvest of non-timber forest products, where applicable. Principle 3. Rational and efficient forest management.

Question	YES / NO*	Reference to scheme documentation
		 Criterion 3.4. Applicant's activities shall be based on multiple forest products and services. 3.4.2. The forest management plan shall aim to maintain the forests' <u>ability to produce</u> <u>a list of timber and non-timber products</u> and services without forest depletion. <i>Complies</i>
5.1.6 A <u>summary of the forest management plan</u> or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is <u>publicly available</u> . The summary may exclude confidential business and personal information and other information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 2.7. General public shall be provided with <u>summary information on planned operations</u> and monitoring results. 2.1.13. A <u>summary of forest management plan</u> including information about the planned forestry operations according to the intensity and scale of forest management shall be <u>publicly available</u>. <i>Complies</i>
5.1.7 <u>Monitoring</u> of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 2.4. <u>Timely monitoring</u> of forest resources and forest management assessment shall be ensured, its results shall be considered during the planning process. Criterion 2.6. Revision of short-, medium- and long-term plans shall be carried out based on monitoring results. 2.6.1. The applicant performs analysis of results of different audits of its activity. 2.6.2. Monitoring and operation control results are incorporated into implementation and revision of forest management plans on the basis of reports. 2.6.3. Current plans are adjusted based on monitoring and operation control results.
5.1.8 <u>Responsibilities</u> for sustainable forest management shall be clearly <u>defined</u> and assigned.	YES	PEFC-RUSSIA-ST-01-2015 Principle 3. Rational and efficient forest management Criterion 3.1. Management and economic activity of the applicant shall be conducted in accordance with principles of sustainable forest management

Question	YES / NO*	Reference to scheme documentation
		3.1.2. <u>Persons</u> with certain functions responsible for sustainable forest management are <u>appointed</u> .
		Complies. Very general requirement.
5.1.9 Forest management practices shall <u>safeguard</u> the quantity and quality of the <u>forest resources</u> in the medium and long term by <u>balancing harvesting and growth rates</u> , and by preferring techniques that <u>minimise</u> direct or indirect <u>damage</u> to forest, soil or water resources.	YES	PEFC-RUSSIA-ST-01-2015 Criterion 3.2. The <u>rates of harvested forest products</u> (timber, non-timber forest products) shall not exceed the levels that can be <u>permanently sustained</u> . 3.2.3. Timber harvest volumes for each species management unit do not exceed the sustainable harvest rate. 3.2.4. Volumes of annual harvest of non-timber forest products do not exceed the allowable sustainable harvest rate. 3.2.6. The harvested timber and non-timber products shall not exceed the rates that may be sustained in the long-term perspective, harvested forest products shall be used optimally. <i>Complies</i>
5.1.10 Appropriate <u>silvicultural measures</u> shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.	YES	 PEFC-RUSSIA-ST-01-2015 3.2.1. The forestry operations shall follow the goal of maintaining or reaching the forest stock that would be economically, environmentally and socially desirable. Criteria 3.3 Productivity and commercial value of forests shall not decrease. 3.3.3. <u>Reforestation, tending and timber harvest</u> shall be made in due time and manner not affecting the productive capacity of the forest plot, for example, by preventing the damage to the remaining stand, trees and forest soils as well as by applying appropriate systems. <i>Complies</i>
5.1.11 <u>Conversion</u> of forests to other types of land use, including conversion of primary forests to forest plantations, <u>shall not occur unless</u> in justified circumstances where the	YES	PEFC-RUSSIA-ST-01-2015 (version 07.08.2015) 3.8.10. Conversion of forests to other types of land use shall not occur unless in justified circumstances described in item 3.8.11 herewith.
conversion:		3.8.11. Conversion of forest to other uses, including conversion of primary forests to

Question	YES / NO*	Reference to scheme documentation
a) is <u>in compliance with national and regional policy and</u> <u>legislation</u> relevant for land use and forest management and is a result of national or regional land-use planning		forest plantations shall be allowed provided there is sufficient evidence that conversion:
governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and		a) does not violate national and regional policies and laws relating to the land use and forest management and is a result of national or regional land use planning regulated by governmental and other state authorities including consultations with individuals and organizations having material and direct interest in them; and
b) entails a <u>small proportion</u> of forest type; <u>and</u>		b) preserves some part of forest lands; and
c) <u>does not have negative impacts on threatened</u> (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats		 c) does not affect threatened (including vulnerable, rare or endangered) forest ecosystems, areas of cultural and social significance, key habitats of threatened species and other protected areas; and
of threatened species or other protected areas; and		d) contributes to the long-term storage, economic and social values.
d) <u>contributes to long-term</u> conservation, economic, and social <u>benefits</u> .		Complies
		PEFC-RUSSIA-ST-01-2015
5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.	YES	3.8.12. Conversion of abandoned agricultural lands and bare lands to forest lands shall be taken into consideration provided it may increase their economic, environmental, social and/or cultural value.
		Complies. Copy of PEFC requirement.
Criterion 2: Maintenance of forest ecosystem health and v	itality	
		PEFC-RUSSIA-ST-01-2015 Principle 2. Planning of operations and monitoring of forest management
5.2.1 Forest management planning shall aim to <u>maintain and</u> <u>increase the health and vitality</u> of forest ecosystems and to	YES	Criterion 2.1. Forest management shall be planned in accordance with the principles and criteria of sustainable forest management
<u>rehabilitate degraded forest ecosystems</u> , whenever this is possible by silvicultural means.		2.1.3. The forest management plans shall aim to maintain and improve health and viability of forest ecosystems and restore the degraded forest ecosystems when this may be reached using forestry methods.
		Complies. Copy of PEFC requirement.
5.2.2 Health and vitality of forests shall be periodically	YES	PEFC-RUSSIA-ST-01-2015
monitored, especially key biotic and abiotic factors that		Criterion 2.4. Timely monitoring of forest resources and forest management

Question	YES / NO*	Reference to scheme documentation
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.		assessment shall be ensured, its results shall be considered during the planning process. 2.4.3. The <u>sanitary condition and viability of forests shall be regularly monitored</u> , especially key biotic and abiotic factors which may affect the sanitary condition and viability of forest ecosystems such as pests, diseases, excessive grazing and excessive timber stock, fires and damage caused by climatic factors, air pollutants or agricultural operations. <i>Complies. Copy of PEFC requirement. Reference to the relevant sanitary monitoring systems and their requirements should be made.</i>
5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems shall take into consideration the effects of naturally occurring fire, pests and other disturbances.	YES	PEFC-RUSSIA-ST-01-2015 2.4.3. The <u>sanitary condition and viability of forests shall be regularly monitored</u> , especially key biotic and abiotic <u>factors which may affect the sanitary condition</u> and viability of forest ecosystems such as <u>pests</u> , <u>diseases</u> , excessive grazing and excessive timber stock, <u>fires and damage caused by climatic factors</u> , <u>air pollutants</u> or agricultural operations. <i>Complies. Copy of PEFC requirement 5.2.2.</i>
5.2.4 Forest management plans or their equivalents shall specify ways and means to <u>minimise the risk of degradation</u> of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.	YES	 PEFC-RUSSIA-ST-01-2015 2.1.4. The forest management plans shall indicate the ways and means for minimizing the risk of degradation of, and damage to the forest ecosystems. In accordance with the Forest Code of the Russian Federation (art. 88 Forest Development Plan): 1. The person, to whom the land plot has been granted into the permanent (perpetual) use, shall prepare a forest development plan against art. 12 of the Forest Code of the RF. This article specifies that in the process of forest exploitation on the ground of complex approach the following activities shall be performed: a) Organization of forest use; b) Development and exploitation of the objects of forest and timber processing infrastructure; c) Measures aimed at conservation, protection and reproduction of forests;

Question	YES / NO*	Reference to scheme documentation
		 d) <u>Measures aimed at protection, utilization of fauna and water</u> <u>objects</u>. The content of Forest Development Plan and the stages of its development (the order of Rosselkhoz # 69 dd. 29.02.2012) <u>provide detailed</u> <u>requirements for all types of forest use and specifies the necessity of</u> <u>forests assessment and measures aimed at conservation, protection and</u> <u>reproduction of forests as well as measures aimed at protection of fauna</u> <u>and water objects</u>. <u>Complies</u>
5.2.5 Forest management practices shall make <u>best use of</u> <u>natural structures</u> 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 <u>genetic</u> , <u>species and structural diversity</u> shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 4.7. Chemical and biological agents are used in accordance with current regulations. 4.7.13. <u>Biological control agents shall be primarily used</u> in accordance with the rules and regulations. Criterion 4.1. Genetic, species and ecosystem <u>diversity</u> shall be maintained and improved. C2.4. Timely monitoring of forest resources and forest management assessment shall be ensured, its results shall be considered during the planning process. 2.4.4. During forestry operations information is collected and assessed by the following indicators: actual/rated timber harvest ratio; ratio of areas of clear and selective cuttings and the dynamics of this indicator; forest areas and the share of economically valuable species; volume of removed forest products; dynamics of mean annual increment; scale of reforestation; <u>species, age and yield class structure of forests;</u> protected areas by category; volumes of biotechnical operations; volumes of changes in composition of protected species; environmental and social impacts of harvesting and other forestry operations;

Question	YES / NO*	Reference to scheme documentation
		- aggregate expenditure on forest management.
		2.1.16. The admissible volume of sustainable forest use ensuring the maintenance of the quantity and quality of forest resources in the long and medium perspective are determined on the basis of the balanced harvest/increment ratio and mainly techniques used to minimize direct and indirect damage to forest, soil and water resources.
		Complies. Diversity is clearly required and information on natural structures and procedures is collected. In Pest and disease management biological control agents should be preferred.
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-RUSSIA-ST-01-2015
		4.9.4. Artificial burning is prohibited unless it is allowed for the purpose of forest management.
		5.1.5. Practical guidelines for identifying and establishing exploitation regimes of protected forests and specially protected forest plots are available.
		Complies
		PEFC-RUSSIA-ST-01-2015
5.2.7 Appropriate forest management practices such as reforestation and afforestation with <u>tree species and</u> <u>provenances that are suited to the site conditions</u> or the use of tending, harvesting and transport techniques <u>that minimise</u>	YES	3.3.3. Reforestation, tending and timber harvest shall be made in due time and manner not affecting the productive capacity of the forest plot, for example, by <u>preventing the damage to the remaining stand</u> , trees and forest <u>soils</u> as well as by applying appropriate systems.
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.		Criterion 4.8. <u>Recycling</u> of production and domestic waste accumulated during economic activity shall be ensured.
Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.		4.8.1. Available <u>rules and instructions for handling chemicals</u> , containers, liquid and solid non-organic waste, including fuels and lubricants.
		4.8.3. Chemicals and their containers, liquid and solid non-organic waste including fuels and lubricants are stored and recycled according to the established <u>regulations</u> .

Question	YES / NO*	Reference to scheme documentation
		4.8.4. Waste from machinery and equipment operation is removed from the logging area upon completion of operations.
		4.8.5. Non-organic waste and garbage shall not be left.
		4.8.6. In the course of operation of machines and equipment, <u>environmentally</u> <u>friendly lubricants and fuel are preferred</u> .
		4.8.7. Refueling and oil change in chain saws, machines and equipment shall be performed in <u>specially designated areas</u> with a minimal risk of contamination.
		4.8.8. Protection of soil and water is ensured during storage and refilling of fuel and lubricants.
		4.8.9. No oil leaks are allowed during harvesting works, road building and forestry works; no forest waste may be disposed without prior sorting.
		4.8.10. Places for storage of chemicals, fuel, lubricants and waste are equipped in accordance with safety regulations.
		4.6.1. The species composition in forests and on plantations is determined on the basis of forest seed base.
		4.6.2. For forest reproduction and afforestation, <u>endemic species and local species</u> <u>well adapted to the conditions of the forest plot shall be used</u> , where applicable. Exotic species or varieties may not be used unless they underwent assessment for effect on ecosystem and genetic integrity and the negative impact may be prevented or minimized.
		Complies
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	YES	PEFC-RUSSIA-ST-01-2015 Criterion 4.7. Chemical and biological agents are used in accordance with current regulations.
		4.7.7. A strategy relying on biological pesticides for pest control methods rather than chemical ones is in place.

Question	YES / NO*	Reference to scheme documentation
		Complies
5.2.9 The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available.	YES	 PEFC-RUSSIA-ST-01-2015 (version 07.08.2015) 4.7.8. The World Health Organization list of prohibited pesticides and chemicals type 1A and 1B and other highly toxic pesticides, groups of chlorocarbons whose derivatives retain biological activity and accumulate in food chains, pesticides prohibited by the international agreement and defined in the 2001 Stockholm Convention on Persistent Organic Pollutants (as amended) is available. 4.7.9. The use of pesticides type 1A and 1B under WHO and other highly toxic pesticides is prohibited except where no viable alternative is available. The use of pesticides, such as chlorinated hydrocarbons whose derivate remain biologically active and accumulate in the food chain beyond their intended use, as well as any pesticides banned by international agreement is prohibited. Complies
5.2.10 Pesticides, such as chlorinated hydrocarbons whose derivate remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.	YES	PEFC-RUSSIA-ST-01-2015 (version 07.08.2015) 4.7.9. The use of pesticides type 1A and 1B under WHO and other highly toxic pesticides is prohibited except where no viable alternative is available. The use of pesticides, such as chlorinated hydrocarbons whose derivate remain biologically active and accumulate in the food chain beyond their intended use, as well as any pesticides banned by international agreement is prohibited. <i>Complies</i>
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	PEFC-RUSSIA-ST-01-2015 (version 07.08.2015) 4.7.12. Instructions and safety guidelines including producer's instructions for allowed pesticides and chemicals use are followed. Complies

Question	YES / NO*	Reference to scheme documentation
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	YES	PEFC-RUSSIA-ST-01-2015 4.7.1 The use of fertilizers is allowed only on the permanent sites of seed bearer trees, plantations, in nurseries, during afforestation of non-forest lands and reforested areas when the necessity of such use is supported by assessments and permits in accordance with legislation. <i>Complies. Standard clearly specifies where and under which conditions fertilizers may</i>
Criterion 3: Maintenance and encouragement of productiv	e functio	be used. ns 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-RUSSIA-ST-01-2015 C 2.1. Forest management shall be planned in accordance with the principles and criteria of sustainable forest management 2.1.16. The admissible volume of sustainable forest use ensuring the maintenance of the quantity and quality of forest resources in the long and medium perspective are determined on the basis of the balanced harvest/increment ratio and mainly techniques used to minimize direct and indirect damage to forest, soil and water resources. <i>Complies</i>
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 2.2. Economic feasibility (efficiency) of planned operations shall be ensured in view of market. 2.2.3. The applicant conducts market research of forest products. 2.2.5. The applicant has a financial plan, providing funds for forestry and forest protection operations. 2.2.6. The applicant regularly reviews plans based on ecological and social-economic changes as well as financial possibilities. <i>Complies</i>
5.3.3 Forest management plans or their equivalents shall take into account the <u>different uses or functions of the</u> <u>managed forest area</u> . Forest management planning shall	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 3.4. Applicant's activities shall be based on multiple forest products and services. 3.4.1. Forest management plan shall include section for <u>registering multiple forest</u>

Question	YES / NO*	Reference to scheme documentation
make use of those policy instruments set up to support the		functions and uses.
production of commercial and non-commercial forest goods and services.		3.4.2. The forest management plan shall aim to maintain the forests' ability to produce a list of timber and non-timber products and services without forest depletion.
		3.4.3. The applicant has worked out and adopted a policy for sustainable forest management including support of production of commercial and non-commercial forest products and services.
		Complies
5.3.4 Forest management practices shall maintain and		PEFC-RUSSIA-ST-01-2015
improve the forest resources and encourage a diversified output of goods and services over the long term.	YES	Criterion 3.4. Applicant's activities shall be based on multiple forest products and services.
		Complies
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		PEFC-RUSSIA-ST-01-2015
	YES	3.3.3. Reforestation, tending and timber harvest shall be made in due time and manner not affecting the productive capacity of the forest plot, for example, by preventing the damage to the remaining stand, trees and forest soils as well as by applying appropriate systems.
soil, and by using appropriate systems.		3.3.4. Forestry operations are performed as scheduled.
		Complies. Copy of PEFC requirement
5.3.6 Harvesting levels of both wood and non-wood forest	YES	PEFC-RUSSIA-ST-01-2015 Criterion 3.2. The rates of harvested forest products (timber, non-timber forest products) shall not exceed the levels that can be permanently sustained.
products <u>shall not exceed a rate that can be sustained</u> in the long term, and optimum use shall be made of the harvested		3.2.2. A system for recording harvested forest resources is in place.
forest products, with due regard to nutrient off-take.		3.2.3. Timber harvest volumes for each species management unit do not exceed the sustainable harvest rate.
		Complies
		PEFC-RUSSIA-ST-01-2015
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	3.2.4. Volumes of annual harvest of non-timber forest products do not exceed the allowable sustainable harvest rate.
		3.2.5. When non-timber forest products use including hunting and fishing is recorded in the area controlled by the applicant and included in forest management plan, it shall be regulated, monitored and controlled.

Question	YES / NO*	Reference to scheme documentation
		3.2.6. The harvested timber and non-timber products shall not exceed the rates that may be sustained in the long-term perspective, harvested forest products shall be used optimally. <i>Complies</i>
5.3.8 Adequate <u>infrastructure</u> such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 3.8. A proper infrastructure such as roads, skidding trails or bridges required for effective supply of products and services with minimum environmental disturbance shall be planned, created and maintained. 3.8.1. The plan for harvesting and forestry operations and road construction shall contain provisions for removal of production waste, operation of machines and equipment waste. 3.8.3. The harvesting operations use environmentally friendly techniques designed to minimize environmental impacts.
		 3.8.5. Designing and construction of roads and bridges is implemented with conservation of natural routes of animal migration creating necessary infrastructure. 3.8.6. Usage of forest roads or hydrotechnical structures including bridges, shall not lead to disturbance or pollution of water reservoirs, waterways, beds of small rivers and streams (including non-perennial). <i>Complies</i>
Criterion 4: Maintenance, conservation and appropriate e	nhanceme	
		PEFC-RUSSIA-ST-01-2015 Principle 4. Conservation of biological diversity, viability of forest ecosystems and forest functions.
5.4.1 Forest management <u>planning</u> shall aim to maintain, conserve and enhance <u>biodiversity</u> on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.	YES	 Criterion 4.1. Genetic, species and ecosystem diversity shall be maintained and improved. 4.1.1. The forest management plan shall aim to maintain, preserve and enhance the biological diversity of the ecosystem, species and genetic diversity and, where possible, diversity at the landscape level. <i>Complies. Copy of PEFC requirement.</i>
5.4.2 Forest management planning, inventory and mapping		PEFC-RUSSIA-ST-01-2015 (version 07.08.2015)
of forest resources shall <u>identify</u> , protect and/or conserve ecologically <u>important forest areas</u> containing significant concentrations of:	YES	4.1.2. The forest management planning, inventory and mapping shall identify, protect and/or preserve environmentally valuable forest areas with significant concentrations of:

Question	YES / NO*	Reference to scheme documentation
 a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists; c) endangered or protected genetic <i>in situ</i> resources; and taking into account d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species. 		 a) protected, rare, sensitive or sample key forest habitats such as riparian zones and wetlands; b) areas occupied by endemic species and habitats of threatened species identified and included in the reference lists; the Red Data Books, the list of species that are not authorized for harvesting; c) endangered and protected genetic resources; as well as taking into account d) landscapes where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance, of global, regional and national importance. 1.6.5. Listings (Red Books) of rare, threatened and endangered flora and fauna species of the Russian Federation and those of subject of the Russian Federation where forest certification is conducted are available. The standard makes a reference for the Red Data Book – a Russian document listing rare/endangered species.
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-RUSSIA-ST-01-2015 4.1.2. The forest management planning, inventory and mapping shall identify, protect and/or preserve environmentally valuable forest areas with significant concentrations of: a) protected, rare, sensitive or sample key forest habitats such as riparian zones and wetlands; b) areas occupied by endemic species and habitats of threatened species identified and included in the reference lists; c) endangered and protected genetic resources; as well as taking into account d) landscapes where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance, of global, regional and national importance. 1.6.6. Applicant has made a list of flora and fauna species as well as areas falling

Question	YES / NO*	Reference to scheme documentation
		under the ratified Conventions.
		Complies. 4.1.2 Is a copy of PEFC requirement.5.4.3.
5.4.4 Forest management shall ensure successful		PEFC-RUSSIA-ST-01-2015
regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.	YES	4.6.8. The forest management shall ensure successful reproduction by natural regeneration or, if this is not expedient, planting on the scale sufficient to guarantee the required volume and quality of forest resources.
		Complies. Copy of PEFC requirement but yet explicit in a Russian context.
5.4.5 For reforestation and afforestation, origins of native		PEFC-RUSSIA-ST-01-2015 Criterion 4.6. In reforestation and plantations <u>native</u> prevailing <u>species shall be primarily used</u> .
species and local provenances that are well-adapted to site		4.6.3. Exotic species are used only on plantations.
conditions shall be preferred, where appropriate. Only those		4.6.4. Set-up of plantations is only possible after affirmative ecological expertise.
introduced species, provenances or varieties shall be used	YES	4.6.5. The forest plantation design and exploitation plans are available.
whose impacts on the ecosystem and on the <u>genetic integrity</u> of native species and local provenances have been		4.6.6. The use of exotic species on plantations is controlled.
evaluated, and if negative impacts can be avoided or minimised.		4.6.7. During reforestation, possibilities of natural regeneration are taken into account.
		Complies. Natural regeneration is a priority and in planting local species are used.
5.4.6 Afforestation and reforestation activities that contribute	YES	PEFC-RUSSIA-ST-01-2015
to the improvement and restoration of ecological connectivity shall be promoted.		4.6.10. Forest regeneration and afforestation shall be promoted to improve and restore ecological links.
		Complies
		PEFC-RUSSIA-ST-01-2015
5.4.7 Genetically-modified trees shall not be used.	YES	4.7.14. Genetically modified organisms shall not be applied.
,		Complies. Copy of PEFC requirement. Explicit requirement also in the Russian context
.4.8 Forest management practices shall, where appropriate,		PEFC-RUSSIA-ST-01-2015
promote a diversity of both <u>horizontal and vertical structures</u> 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	4.1.1. The forest management <u>plan shall aim to maintain, preserve and enhance the biological diversity</u> of the ecosystem, species and genetic diversity and, where possible, diversity at the landscape level.

Question	YES / NO*	Reference to scheme documentation
		4.2.6. Forestry operations shall take into consideration all socio-economic functions, especially recreational one, and aesthetic values of forests by supporting <u>representative forest structures</u> and encouraging the growth of perspective trees, groves and other attributes such as colour scheme, flowers and fruits, in the manner and scale preventing serious impact on forest resources and lands.
		Complies. The standard oblige to enhance biological diversity and structural diversity is specifically referred to in recreational forests.
		PEFC-RUSSIA-ST-01-2015
		4.1.16. Traditional forest management systems creating valuable ecosystems such as coppice system on condition its economic viability, shall be maintained.'
		Complies. Copy of PEFC requirement. It is though recommended that the standard adapts this requirement to the Russian context.
		In accordance with the Forest Code of the RF:
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.		Article 48. Forest use on the areas of traditional habitat of people who are considered to be indigenous small-numbered peoples of the North, Siberia and Far East of the Russian Federation.
	YES	On the areas of traditional habitat of people who are considered to be indigenous small- numbered peoples of the North, Siberia and Far East of the Russian Federation in the process of forest use indigenous environment of these peoples and their <u>traditional</u> <u>lifestyle shall be protected</u> in accordance with the federal law 82-FZ dd. 30.04.1999 "On the guarantees of the rights of indigenous small-numbered peoples of the Russian Federation".
		This provision corresponds and is being realized together with the government edict # 631-p dd. 08.05.2009.
		 The list of types of traditional economic activity of indigenous small-numbered peoples of the Russian Federation: Animal breeding including livestock breeding on pastures (deer farming, horse breeding, ox breeding, and sheep breeding). Processing of animal breeding products including collection, gathering, and manufacturing of fell, wool, fir, ossified horns, hooves, unossified antlers, bones, blood-vascular glands, meat, sub products. Dogs breeding (breeding of hunting and sledge dogs).

Question	YES / NO*	Reference to scheme documentation
		4. Animals breeding, processing and realization of animal breeding products.
		5. Bee-keeping, apiculture.
		6. Fishery (including sea hunting) and realization of water resources.
		7. Commercial hunting, processing and realization of hunting products.
		8. Agriculture (olericulture), as well as growing and processing of valuable medicine plants.
		9. Timber harvesting and non-timber products gathering for own needs.
		10. Gathering (extracting, proceeding and realization of food forest resources, medical plants).
		Complies. Reference to Forest Code establishes a compliance.
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.		PEFC-RUSSIA-ST-01-2015
	YES	3.3.3. Reforestation, tending and timber harvest shall be made in due time and manner not affecting the productive capacity of the forest plot, for example, by preventing the damage to the remaining stand, trees and forest soils as well as by applying appropriate systems.
		4.1.1. The forest management plan shall aim to maintain, preserve and enhance the biological diversity of the ecosystem, species and genetic diversity and, where possible, diversity at the landscape level
		Complies.
		PEFC-RUSSIA-ST-01-2015
5.4.11 <u>Infrastructure</u> shall be planned and constructed in a way that <u>minimises damage to ecosystems</u> , especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	YES	3.8.5. Designing and construction of roads and bridges is implemented with conservation of natural routes of animal migration creating necessary infrastructure.
		4.1.2. The forest management planning, inventory and mapping shall identify, protect and/or preserve environmentally valuable forest areas.
		Complies. The Standard should make reference to relevant regulations/ guidelines on forest road building or provide more practical guidance for consideration of biodiversity values in infrastructure development.
5.4.12 With due regard to management objectives, measures shall be taken to balance the pressure of animal populations	YES	PEFC-RUSSIA-ST-01-2015

Question	YES / NO*	Reference to scheme documentation
and grazing on forest regeneration and growth as well as on biodiversity.		4.4.7. Taking into consideration the goals of forest management, measures to reduce the impact of animal populations and grazing on forest regeneration, increment and biological diversity shall be taken.
		Complies
		PEFC-RUSSIA-ST-01-2015
5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities		4.1.20. To reduce adverse environmental impact of harvesting, it is necessary to leave in quality and allocation to provide biological diversity taking into account potential influence on health and stability of forests and surrounding ecosystems, the following elements of forest ecosystem (or their parts) especially when logging and hauling are not justified by economic or sanitary reasons, essential components of biological diversity shall be preserved, such as, for instance:
and distribution necessary to safeguard biological diversity,	YES	- old trees of non-target species;
taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.		- ecologically valuable trees;
		- seed trees of economically valuable species;
		- dead standing trees and windfall;
		- hollow trees;
		- over mature forest and individual rare tree species.
		Complies
Criterion 5: Maintenance and appropriate enhancement of	protectiv	e functions in forest management (notably soil and water)
		PEFC-RUSSIA-ST-01-2015
		Criterion 2.3. Assessment and coordination of all planning procedures regulating forest management shall be conducted according to <u>legislation</u> .
5.5.1 Forest management planning shall aim to maintain and enhance protective functions of forests for society, such as protection of infrastructure, protection from soil erosion, protection of water resources and from adverse impacts of water such as floods or avalanches.	YES	2.3.5. The forest management plan shall aim to maintain and enhance the protective functions of forests valuable for the society, such as protection of infrastructural facilities, prevention of soil erosion, water resources protection and protection against adverse impacts of water resources such as floods and avalanches.
		This requirement shall be fulfilled together with the order of Rosselkhoz # 69 dd. 29.12.2012 "The Contents of Forest Development Plan and the Stages of its Development" that includes the following requirements:
		3. Forest Development Plan contains the information on allowable types and

Question	YES / NO*	Reference to scheme documentation
		estimated volume of forest use, <u>measures aimed at forest conservation</u> , <u>protection</u> and regeneration, <u>development of forest and timber processing</u> <u>infrastructure</u> , <u>protection of fauna and water objects</u> , <u>and in cases specified</u> in part 1 of art. 21 of the Forest Code of the RF also the information <u>on building</u> , <u>reconstruction</u> and exploitation of objects that are not connected with the development of forest infrastructure. Also ref. to Q 5.4.2 of the checklist. <i>Complies. Reference to Forest Code together with the standard requirements</i> <i>establish a compliance</i> .
5.5.2 Areas that fulfil specific and recognised <u>protective</u> <u>functions for society shall be registered and mapped</u> , and forest management plans or their equivalents shall take these areas into account.	YES	 PEFC-RUSSIA-ST-01-2015 2.1.12. The forest management plan shall be composed of the following sections: c) description of used forest resources, <u>environmental restrictions</u>, <u>regulation on land</u> <u>use and title</u>, socio-economic conditions, as well as <u>information about adjacent lands</u>; h) environmental measures; i) plans to identify and protect rare and endangered species as well as species included in the federal and regional Red List Books of flora and fauna species; j) maps depicting the main forest resources including protected areas and planned forestry operations as well as land title; k) measures to preserve and maintain protective forests and specially protected forest areas; <i>Complies. The protective functions are taken into consideration in the planning as defined in regulations.</i>
5.5.3 Special <u>care</u> shall be given to silvicultural <u>operations on</u> <u>sensitive soils and erosion-prone areas</u> as well as in areas where operations might lead to excessive erosion of soil into watercourses. <u>Inappropriate techniques</u> such as deep soil tillage and use of unsuitable machinery shall be <u>avoided</u> in such areas. Special measures shall be taken to <u>minimise the pressure of animal populations</u> .	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 4.4. Measures shall be taken to prevent disturbance and degradation of forest ecosystems. 4.4.3. Preventive measures based on assessment of forest ecosystems degradation risk (natural dissimilation, degradation as a result of erosion, harvesting on hillsides, etc.) are taken. 3.8.6. Usage of forest roads or hydrotechnical structures including bridges, shall not lead to disturbance or pollution of water reservoirs, waterways, beds of small rivers and streams (including non-perennial).

Question	YES / NO*	Reference to scheme documentation
		3.8.9. Forest management includes requirements for construction and use of drainage system that prevent inundation and flooding
		5.3.7. Summary data on Specially Protected Nature Areas (SPNA) and candidate SPNA are <u>excluded from transportation network</u> plans as well as from industrial exploration of natural resources shall be available.
		5.3.8. Maps indicating Specially Protected Nature Areas (SPNA) and candidate SPNA are excluded from transportation network plans as well as from industrial exploration of natural resources shall be available.
		4.9.2. Machinery and equipment suitable for local conditions which do not have negative impact on soils and water resources is used.4.9.17. Water protection zones for all waterways, water bodies and surface bogs are established.
		Complies. Pressure of animal population is not either addressed, a statement if it is relevant or irrelevant in the Russian context is needed.
		 PEFC-RUSSIA-ST-01-2015 Criterion 4.9. Technological processes, machinery and equipment which do not have adverse impacts on soils and water resources shall be used. 4.9.2. Machinery and equipment suitable for local conditions which do not have negative impact on soils and water resources is used.
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		4.9.3. Chemical and other hazardous substances or inappropriate forestry practices affecting the quality of water resources are prohibited.
resources. <u>Inappropriate use of chemicals</u> or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.	YES	4.9.10. Instructions impose restrictions on certain operations, for instance: skidding uphill on hillsides, as well as rocky outcrops and ravines, cableway yarding, prohibiting skidding during the seasons when soil is saturated with water, prohibition of skidding on rivers and lakes, logging in protected areas, the number of log-loading sites.
		4.9.15. Logs are not removed by water bodies, waterways, beds of small rivers and streams (including those drying up).
		4.9.17. Water protection zones for all waterways, water bodies and surface bogs are

Question	YES / NO*	Reference to scheme documentation
		established. 4.9.18. Maps delineate the boundaries of water protection territories/zones. 4.9.19. Protected territories/zones shall be marked by prohibiting signs and traffic restrictions. <i>Complies</i>
5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.	YES	PEFC-RUSSIA-ST-01-2015 4.9.7. Construction of roads, bridges, hydrotechnical structures and other infrastructural facilities shall minimize soil denudation, prevent water bodies from soil contamination and ensure the natural level and functions of water bodies and river beds. <i>Complies</i>
Criterion 6: Maintenance of other socio-economic function	ns and co	nditions
5.6.1 Forest management planning shall aim to respect the <u>multiple functions of forests</u> to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for <u>employment</u> in connection with the socio-economic functions of forests.	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 6.6. Conditions shall be created for preferential employment of local population. 6.6.1. The applicant implements a policy for preferential employment of local population. 6.6.2. There is no recorded evidence of discrimination of local population in employment opportunities. 6.6.4. The applicant adopted an employment policy, priority employment opportunities for the local population and professional training of new workers from local residents. Criterion 6.7. Conditions shall be created for economic development of the district, diversification of production and provision of goods and services for local population. 6.7.3. The applicant implements its own or participates in a program for diversification of the local economy. Criterion 6.8. Local and indigenous communities shall have a guarantee of participation in decision making related to forest management planning on territories adjacent to the places of their residence. 6.8.1. The forest management plans shall aim to consider multiple forest functions valuable for the society, in particular, the role of forestry in the development of rural areas and new employment opportunities for the population in connection with the social and economic functions of forests.

Question	YES / NO*	Reference to scheme documentation
		Complies. Several indicators require emphasis on work opportunities for local people and diversification of economy. Indicator 6.8.1 is a copy of PEFC requirement.
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	YES	 PEFC-RUSSIA-ST-01-2015 Criterion 6.5. Legal and customary rights of local population and indigenous peoples shall be observed. 6.5.1. Places of residence and territory of traditional land use of local population and indigenous peoples are identified. 6.5.2. All legal and customary rights of local population and indigenous peoples are defined. 6.5.3. A documented agreement on respecting legal and customary rights of local population and indigenous peoples as well as controlling forest management activities on their lands and territories shall be recorded. 6.5.4 The applicant's operations are in conformity with legal and traditional rights of local population and indigenous peoples for traditional nature use. 2.1.15. The measures to exercise the rights and guarantees of workers and local population are planned.
		5.2.4. Forests of key importance for local population are used in agreement with local population. <i>Complies</i> PEFC-RUSSIA-ST-01-2015
5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.	YES	 1.1.1. Requirements of the Russian legislation are complied with during incorporation and registration of the applicant. 1.4.1. There are available duly <u>documented</u> <u>tenure and use and lease rights</u> to forest resources, the term of which is not less than the validity period of the certificate. Criterion 6.5. Legal and customary rights of local population and indigenous peoples shall be observed. 6.5.2. All legal and customary rights of local population and indigenous peoples shall be observed.
		 6.5.2. All legal and customary rights of local population and indigenous peoples are defined. 6.5.3. A documented agreement on respecting legal and customary rights of local population and indigenous peoples as well as controlling forest management activities on their lands and territories shall be recorded. 6.5.4 The applicant's operations are in conformity with legal and traditional rights of

Question	YES / NO*	Reference to scheme documentation
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		Reference to scheme documentation local population and indigenous peoples for traditional nature use. Complies PEFC-RUSSIA-ST-01-2015 Criterion 6.5. Legal and customary rights of local population and indigenous peoples shall be observed. 6.5.2. All legal and customary rights of local population and indigenous peoples are defined. 6.5.3. A documented agreement on respecting legal and customary rights of local population and indigenous peoples as well as controlling forest management activities on their lands and territories shall be recorded. 6.5.4. The applicant's operations are in conformity with legal and traditional rights of local population and indigenous peoples for traditional nature use. Criterion 6.9. The level of forest management shall provide sufficient resources for subsistence, health and welfare of indigenous peoples and local population on applicant's territory shall be maintained. 6.9.1. Indigenous peoples' interests and knowledge regarding forest species and management systems are identified during consultations. 6.9.2. The management of the applicant takes into account all information on possible use of traditional knowledge of indigenous peoples and local population. 6.9.3. The forestry operations shall effectively use the local experience and
and fair resolution. In such cases forest managers shall, in the interim, provide <u>meaningful opportunities for parties to be</u> <u>engaged in forest management decisions</u> whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.		 knowledge, for example, those of local communities, forest owners, NGO and local population. 6.9.4. The process for compensating indigenous peoples for the application of traditional skills and knowledge in the area of sustainable forest and natural resource use shall be documented. 6.9.5. Forest management shall take into account the system of legal, customary and traditional rights as determined in ILO Convention 169 and UN Convention on Indigenous Peoples; any deviations shall not be allowed unless there is a free, prior
		 and informed consent of right holders including the provision on compensation, where applicable. (<i>Copy of PEFC requirement</i>) 6.9.6. Indigenous peoples are duly compensated for the application of traditional skills and knowledge in the use of flora and fauna, as well as forest management systems on the basis of agreements between the applicant, local authorities and representative body of indigenous people.

Question	YES / NO*	Reference to scheme documentation
		6.9.7. Jointly with indigenous peoples, places of special cultural, ecological, economic and religious significance are identified and regulations for their protection and/or use are approved, including the migration paths of domestic and game animals.
		6.9.8. Places of special cultural, ecological, economic, cultural and religious significance, territories of traditional use of natural resources including the migration paths of domestic and game animals are marked on the ground and on the maps.
		Complies. The PEFC Russia Certification System shall refer to the procedures to identify and recognize indigenous communities in Russia and other related regulations.
5.6.5 Adequate public access to forests for the purpose of		PEFC-RUSSIA-ST-01-2015
recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	4.10.7. The applicant does not obstruct free access to the leased territories for the purposes of hunting, fishing, mushroom and berry gathering, tourism, etc. except during fire danger periods in emergency situations. <i>Complies.</i>
		PEFC-RUSSIA-ST-01-2015
5.6.6 Sites with recognised specific <u>historical, cultural or</u> <u>spiritual significance</u> and areas <u>fundamental to meeting the</u> <u>basic needs of local communities</u> (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site	YES	6.9.9. Approved areas of special historical, cultural, economic, religious and spiritual significance and areas fundamental for meeting the basic needs of the local communities (e.g., health, subsistence) and their management systems shall be protected.
of the significance of the site.		Complies. A copy of PEFC requirement, but it can be interpreted at a FMU level, although the requirement may lead to different level of interpretations.
5.6.7 Forest management operations shall take into account		PEFC-RUSSIA-ST-01-2015
all socio-economic functions, especially the <u>recreational</u> <u>function and aesthetic values of forests by</u> 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	YES	4.2.6. Forestry operations shall take into consideration all socio-economic functions, especially recreational one, and aesthetic values of forests by supporting representative forest structures and encouraging the growth of perspective trees, groves and other attributes such as colour scheme, flowers and fruits, in the manner and scale preventing serious impact on forest resources and lands.
to an extent that does not lead to serious negative effects on forest resources, and forest land.		Complies.
		A copy of PEFC requirement. The general requirement is recommended to be

Question	YES / NO*	Reference to scheme documentation
		adapted to the context of Russian forest management.
		This requirement shall be fulfilled together with the order of Rosselkhoz # 69 dd. 29.12.2012 "The Contents of Forest Development Plan and the Stages of its Development", art. 19 - Recreation activity.
		Complies. Reference to Forest Code together with the standard requirements establish a compliance.
5.6.8 Forest managers, contractors, employees and forest		 PEFC-RUSSIA-ST-01-2015 Criterion 6.4. The workers shall be offered opportunities for developing professional skills. 6.4.1. The applicant has a program for personnel training and retraining for
owners shall be provided with <u>sufficient information and</u> <u>encouraged to keep up-to-date through continuous training</u> in	YES	6.4.1. The applicant has a program for personnel training and retraining for improvement of professional skills.
relation to sustainable forest management as a precondition for all management planning and practices described in this standard.		3.1.3. The applicant shall clarify the principles and criteria of sustainable forest management to the applicant's workers, subcontractors and forest users.
		Complies
		PEFC-RUSSIA-ST-01-2015
5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as	YES	6.9.3. The forestry operations shall effectively use the local experience and knowledge, for example, those of local communities, forest owners, NGO and local population. <i>(Copy of PEFC requirement)</i>
those of local communities, forest owners, NGOs and local people.		6.9.2. The management of the applicant takes into account all information on possible use of traditional knowledge of indigenous peoples and local population.
		6.9.3. The forestry operations shall effectively use the local experience and knowledge, for example, those of local communities, forest owners, NGO and local population.
	ļ	Complies
5.6.10 Forest management shall provide for effective <u>communication and consultation</u> with local people and other stakeholders relating to sustainable forest management and	YES	PEFC-RUSSIA-ST-01-2015 6.2.4. All complaints of local population, local communities of indigenous peoples are documented, considered and mutually acceptable decisions are taken including compensation for damage or loss (to property, resource and living standards).
shall provide appropriate mechanisms for <u>resolving</u> <u>complaints and disputes</u> relating to forest management between forest operators and local people.	TES	1.4.5. A procedure for processing complaints and resolution of disputes over forest management between timber companies and local communities are in place.
		1.4.6. There are no outstanding disputes over tenure rights to forest plots or such disputes are being resolved within legal framework as of the date of certification.

Question	YES / NO*	Reference to scheme documentation
		1.4.7. There are no outstanding disputes over use rights to forest plots or such disputes are being resolved within legal framework as of the date of certification.
		1.7.4. Measures regarding identified disparity in environmental legislation regulating forest management shall be agreed upon consultations with interested parties.5.2.4. Forests of key importance for local population are used in agreement with local population.
		6.2.2. Periodic consultations with forest users of adjacent forest plots, local population and indigenous peoples, business partners, stakeholders and mediators (e.g. round table discussions) are held.
		6.2.10. The documents made following the joint meetings, consultations, round tables with forest users of adjacent forest plots, local population and indigenous peoples, business partners, stakeholders and mediators shall be available.6.5.2. All legal and customary rights of local population and indigenous peoples are defined.
		6.5.3. A documented agreement on respecting legal and customary rights of local population and indigenous peoples as well as controlling forest management activities on their lands and territories shall be recorded.
		6.8.3. Forest management plans shall be agreed upon with local population and indigenous communities.
		6.8.4. The applicant holds consultations with local population and other interested parties for assessment of possible social impacts of economic activity.6.8.5. Local population including indigenous people's communities with legal or
		customary rights of ownership or use of resources is given an opportunity to participate in planning and control of forest management. <i>Complies.</i>
		PEFC-RUSSIA-ST-01-2015
5.6.11 Forestry work shall be planned, organised and performed in a manner that enables <u>health and accident risks</u> to be identified and all reasonable measures to be applied to	YES	Criterion 6.3. Requirements of all applicable laws covering health and safety shall be met.
protect workers from work-related risks. Workers shall be		6.3.1. The texts of laws and provisions regulating the issues of health and safety are available; the workers are made aware of them.

Question	YES / NO*	Reference to scheme documentation
informed about the risks involved with their work and about preventive measures.		 6.3.4. The applicant has the plan for improvement of labor protection, occupational safety and reduction of industrial injuries. 6.3.5. Forestry operations plans take into account the identified health risks and occupational injury risks. <i>Complies</i>
		PEFC-RUSSIA-ST-01-2015
		6.3.6. Forestry operations are carried out, reasonable measures are taken to protect workers against risks related to work.
		6.3.7. Measures are taken to improve labor protection, occupational safety and reduction of industrial injuries.
5.6.12 <u>Working conditions shall be safe</u> , and guidance and <u>training</u> in safe working practices shall be provided to all	YES	6.3.8. The workers shall be made aware of the risks related to their work and measures to prevent such risks.
those assigned to a task in forest operations.		6.3.9. The applicant shall ensure safe working conditions for the workers, including ILO Code of Practice on Safety and Health in Forestry Work: it provides personal protection equipment according to the regulations on labor safety and industrial sanitation as well as first aid in cases of accidents.
		6.3.10. Regular training in work safety is carried out including occupational safety, labor protection, rendering of first aid, actions in emergency situations, etc.
		Complies
		PEFC-RUSSIA-ST-01-2015
		Criterion 1.6. Provisions of international Conventions and agreements ratified by Russia shall be observed.
5.6.13 Forest management shall comply with fundamental		1.6.1. Texts of Conventions ratified by the Russian Federation, as well as resolutions of Helsinki and Montreal processes, materials of Lisbon and Vienna Conferences on Sustainable Forest Management are available.
ILO conventions.	YES	*Conventions of the International Labor Organization 27, 87, 98, 105, 110, 111, 138.
		Criterion 6.1. Workers' rights including but not limited to: forming or joining trade unions or organizations and free collective bargaining with the management of the applicant shall be respected.
		6.1.7. ILO Conventions 87 and 98, Constitution of Russia, Labour Code of Russia and other legal acts regulating labour relations shall be available.
		Criterion 6.3. Requirements of all applicable laws covering health and safety shall

Question	YES / NO*	Reference to scheme documentation
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	 be met. 6.3.9. The applicant shall ensure safe working conditions for the workers, including ILO Code of Practice on Safety and Health in Forestry Work: it provides personal protection equipment according to the regulations on labor safety and industrial sanitation as well as first aid in cases of accidents. Complies PEFC-RUSSIA-ST-01-2015 3.9.8. The applicant's forest management shall rely, inter alia, on the results of scientific research. 3.9.9. The applicant contributes to the research and data collection required for the purpose of sustainable forest management, or, if needed, supports scientific research performed by other organizations. Complies
Criterion 7: Compliance with legal requirements		
		PEFC-RUSSIA-ST-01-2015
		Criterion 1.1. Forest management shall comply with federal laws and laws of the subjects of the Russian Federation.
5.7.1 Forest management shall <u>comply with legislation</u> applicable to forest management issues including forest		Criterion 1.2. All kinds of imposed payments, duties, assignments, taxes and other charges shall be paid.
management practices; nature and environmental protection; protected and endangered species; property, tenure and	YES	Criterion 1.3. The current labour and social legislation ensuring employment guarantees and social obligations to workers shall be complied with.
land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.		Criterion 1.7. The legislation concerning environmental issues of forest management shall be complied with.
		6.5.2. All legal and customary rights of local population and indigenous peoples are defined.6.5.3. A documented agreement on respecting legal and customary rights of local population and indigenous peoples as well as controlling forest management activities on their lands and territories shall be recorded.

Question	YES / NO*	Reference to scheme documentation
		Complies
5.7.2 Forest management shall provide for adequate protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	PEFC-RUSSIA-ST-01-2015 Criterion 1.5. Forest management shall ensure proper protection of forest plots from illegal operations such as illegal cutting, illegal land use, illegally authorized fires and other illegal activities. <i>Complies</i>

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

2 Checklist

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
		I	Certifica	ation Bodies
			YES	1 System regulation - «4.4. Certification bodies and auditors
	 Does the scheme documentation require that certification shall be carried out by <u>impartial</u>, <u>independent third parties</u> 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 		Forest management and/or chain of custody certification bodies shall be impartial third parties that cannot be involved in the process of standard setting as governing or decision-making body or in the process of forest management and shall be independent on the Applicant.»	
1.		· · ·		Forest management and chain of custody certification bodies performingaudits in PEFC Russia system shall meet the criteria set forth in ISO 17021, ISO 19001, ISO 17065 and PEFC ST 2003.
	certified entity?			4.1.3 Impartiality of assessment is ensured by independent certification body and contracted auditors
				Complies. Compliance with the listed standards set the required requirements for impartiality.
			YES	1 System regulation - «4.4. Certification bodies and auditors
2.	2. Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021 or ISO Guide 65?		Forest management and chain of custody certification bodies performing corresponding audits in PEFC Russia system shall meet the criteria set forth in ISO 17021, ISO 19001, ISO 17065 and PEFC ST 2003 "Requirements for Chain of Custody Certification Bodies"»	
				Complies. Compliance with the listed standards set the required requirements for impartiality. Note that the current system regulation requires that all notified

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
				certification bodies shall meet the requirements set for forest AND chain of custody certification .ISO 17065 standard has replaced the ISO Guide 65 Typo in English translation where reference is made to the ISO 19001 standard instead of ISO 19011 standard. In Russian version of the document, the reference is correct.
3.	Does the scheme documentation require that certification bodies carrying out <u>forest</u> certification shall have the <u>technical</u> <u>competence</u> in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	YES	 1 System regulation - «4.4. Certification bodies and auditors For forest management certification, the auditors of the certification body shall have profound knowledge in the followings areas: forest legislation and regulatory framework of the Russian Federation as far as they relate to forestry; government institutions responsible for control and supervision over the forest industry; structure of forest business in the Russian Federation, including organizations responsible for forest regeneration, forest inventory as well as harvesting trade and logistic operations; forestry practices applied in the Russian Federation; impact of economic, social and ecological factors of forestry operations on the environment; interests of stakeholders in forest industry; PEFC Russia systems.»
4.	Does the scheme documentation require that certification bodies shall have a good understanding of the <u>national PEFC system</u>	Annex 6, 3.1	YES	1 System regulation - «4.4. Certification bodies and auditors For forest management certification, the auditors of the certification body shall have profound knowledge in the followings areas: including

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
	against which they carry out forest management certification?			- PEFC Russia systems.» Complies

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
			YES	1 System regulation - «4.4. Certification bodies and auditors
				In addition, the auditors shall have proven track record of audits in PEFC Russia system with regard to the following:
	 5. Does the scheme documentation require that certification bodies have the responsibility to use <u>competent auditors</u> and who have adequate technical know-how on the certification process and issues related to 		 forest management – Russian forestry and timber industry; chain of custody – logging, transportation, industrial processing of wood in the Russian Federation, as well as timber trade; 	
				- good Russian language skills.
			If experience in forest management and chain of custody audit in PEFC Russia system is absent, the certification body shall have a certificate confirming special training (theoretical and practical training courses) in this system.	
			FM certification body shall ensure that the staff performing key activities such as contracts analysis, certificates issuing, monitoring etc. have sufficient and relevant knowledge in specified activities.	
5.			FM certification body shall have a documented procedure to ensure that auditors have personal traits, knowledge and skills in accordance with ISO 19011. These requirements can be met in the following way:	
	forest management certification?			Educationauditors have sufficient level of proficiency and high education diploma in the sphere of forest management and forest industry.
				Trainingauditors for the last two years took part in forest management educational program adopted by PEFC RUSSIA.
			1	Experience: - has experience in the sphere of forest management and/or forest industry not less than 5 years;
				- has been given a special theoretical and practical training in forest management audit within a period of three years organized by PEFC RUSSIA.
				To maintain the status of its forest management auditors,each auditor has not less than two (2) external audits per year and not less than fifteen (15) man-day working units and has been given additional training organized by PEFC RUSSIA.»
				Complies

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
6.	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	1 System regulation - «4.4. Certification bodies and auditors FM certification body shall have a documented procedure to ensure that auditors have personal traits, knowledge and skills in accordance with ISO 19011.» <i>Complies</i>
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [*1]	Annex 6, 3.2	YES	 1 System regulation - «4.4. Certification bodies and auditors Education. Forest management certification body shall ensure that its auditors have sufficient level of proficiency and high education diploma in the sphere of forest management and forest industry. Training. Forest management certification body shall ensure that auditors for the last two years took part in forest management educational program adopted by PEFC RUSSIA. Experience. In the process of entry qualification, forest management certification body shall ensure that auditor: has experience in the sphere of forest management and/or forest industry not less than 5 years; has been given a special theoretical and practical training in forest management audit within a period of three years organized by PEFC RUSSIA. To maintain the status of its forest management auditors, certification body shall ensure that each auditor has not less than two (2) external audits per year and not less than fifteen (15) man-day working units and has been given additional training organized by PEFC RUSSIA.

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
Certi	fication procedures			
8.	Does the scheme documentation require that certification bodies shall have established <u>internal procedures</u> for forest management certification?	Annex 6, 4	YES	 1 System regulations do not clearly require established internal procedures for certification bodies. 7 FM notification document (ND-001) and 8 CoC notification (ND-002) require that certification bodies for chain of custody certification shall have a valid accreditation issued by accreditation body that is a member of IAF and on the other hand 1 System regulations 4.4 Certification bodies and auditors (p. 18) state that certification bodies shall comply with accreditation standards for management system (ISO 17021) and product certification (ISO 17065). These standards require establishment of internal procedures (see below). A certification body shall have a management system (general or ISO 9001 compatible) that cover all aspects relevant in certification ISO 17021 Conformity Assessment. Requirements for bodies providing audit and certification of management system: 2011. 10.3.1. The certification body shall establish, document, implement and maintain a management system that is capable of supporting and demonstrating the consistent achievement of the requirements of this International Standard (ISO 17021:2011). The certification body's top management shall appoint a member of management who, irrespective of other responsibilities, shall have responsibility and authority that include a) ensuring that processes and procedures needed for the management system are established, implemented and maintained.
				ISO 17021 specifically require documented procedures for different activities relevant in certification (document and record control, management review, internal audits, corrective and preventive actions, performance monitoring, outsourcing,

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
				contracting, appeals, audit timing, audit focus and sampling, safety, issuance and withdrawal of a certificate)
				Comply. Through the requirement to have an accreditation to ISO 17021 and ISO 17065 standards.
			YES	1 System regulation - «4.4. Certification bodies and auditors
	Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 4		Forest management and chain of custody certification bodies performing corresponding audits in PEFC Russia system shall meet the criteria set forth in ISO 17021, ISO 19001, ISO 17065 and PEFC ST 2003
9.				Complies through the accreditation requirement to ISO standards.
				ISO 17065 has replaced the ISO Guide 65. The System requires that all certification bodies comply with the core accreditation standards for forest management and chain of custody certification. Yet notification procedures are only for chain of custody certification. Note that the ISO 19001 should refer to ISO 19011 standard. The Russian document version has the right reference.
			YES	1 System regulation «4.4. Certification bodies and auditors
10.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO	Annex 6, 4		Forest management and chain of custody certification bodies performing corresponding audits in PEFC Russia system shall meet the criteria set forth in ISO 17021, ISO 19001, ISO 17065 and PEFC ST 2003 "Requirements for Chain of Custody Certification Bodies
	19011?			Complies through the accreditation requirement to ISO standards.
				Note that English translation of the System Description p. 18 has a typo in standard number. Should be ISO 19011.
11.	Does the scheme documentation require that certification body shall <u>inform</u> the relevant	Annex 6, 4	YES	1 System regulations - «4.4. Certification bodies and auditors

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
	PEFC National Governing Body about all <u>issued forest management certificates</u> and changes concerning the validity and scope of these sertificates?			Certification body shall inform PEFC Russia Governing Body about <u>all issued</u> forest management and chain of custody certificates and about any changes related to their expiry date and scope.»
	these certificates?			 7 FM notification ND-001 notified certification body is obliged to provide PEFC Russia GB information about each forest management certification issued any changes to previous certificates
				 8 CoC notification ND-002 notified certification body is obliged to provide PEFC Russia GB information about each <u>chain of custody</u> certificate issued to any organization and information on changes to certificates Complies
12.	Does the scheme documentation require that certification body shall carry out <u>controls of</u> <u>PEFC logo usage</u> if the certified entity is a PEFC logo user?	Annex 6, 4	YES	 1 System regulations - «4.3. Labelling The certification body shall control the use of PEFC logo and inform the Central Body of PEFC Russia about identified non-compliance.» <i>Complies. However, PEFC Russia should make specific and correct references on the CoC certification and the requirements for CoC bodies.</i>
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	YES	 1 System regulations - «4.2. Certification process General provisions Surveillance audit includes: a) planning the surveillance audit (at least once a year).» <i>Complies. Surveillance audits are to be carried out at least once a year.</i>

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
			YES	1 System regulations - «4.2.1 Recertification
14.	Does a maximum period for assessment audit not exceed five years for forest management	Annex 6, 4		1. Issued forest management and chain of custody certificates are valid for 3 and 5 years, respectively.
14.	certifications?			2. Complete recertification shall be carried out before the expiry date of the certificate.»
				Complies
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	 1 System regulations - «3.1. Forest management and chain of custody 3.1.1. Individual Certification The applicant shall publish a summary of certification report.» 3.1.2 Joint (group) certification Group entityis responsible for publication of a summary of the certification report 7 FM notification ND-001, 8 CoC notification ND-002 certification body shall provide PEFC Russia withsummary of certification report Complies. Note the requirement shall be also specified under territorial group certification
16.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	1 System regulations - «4.2. Certification process4.2.1. General provisions

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
17.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	YES	A certification audit includes: b) the certification body notifies the stakeholders about the planned audit and asks for their opinion.» Notification documents ND 001 for forest management and ND 002 for chain of custody require information of stakeholder on planned audits a month beforehand. <u>Complies</u> PEFC Russia System Regulations sections 4.1 and 4.2 specify in detail requirements for certification procedures.
		Ac	creditat	ion procedures
18.	Does the scheme documentation require that certification bodies carrying out <u>forest</u> <u>management certification</u> shall be accredited by a national accreditation body?	Annex 6, 5	YES	 FM notification ND-0011 have valid accreditation issued, by the Russian national accreditation body which is a member of EA (European Co-operation for Accreditation) or IAF (International Accreditation Forum). Complies
19.	Does the scheme documentation require that an <u>accredited certificate shall bear an</u> <u>accreditation symbol</u> of the relevant accreditation body?	Annex 6, 5	YES	 1 System regulation - «4.2. Certification process 4.2.1. General provisions Certificates issued by certification bodies shall be marked with a sign of accreditation body.» Complies. The requirement should be noted in notification conditions
20.	Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a <u>part of the</u>	Annex 6, 5	YES	1 System regulation - «4.5 Accreditation bodies

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
	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?			 Accreditation bodies shall comply with general requirements of ISO/IEC 17011 and be members of International Accreditation Forum (IAF).» 7 FM notification ND-002:2015 (version 07.08.2015) 3. Conditions for notification Certification body shall have valid accreditation issued, by accreditation body that is a member of IAF and comply with the requirements of PEFC ST 2003 "Requirements for Chain of Custody Certification Bodies Old FM notification ND-001:2012 CBs have valid accreditation issued, by the Russian national accreditation body which is a member of EA (European Co-operation for Accreditation) or IAF (International Accreditation Forum). 8 CoC notification ND-002:2015 CBs have valid accreditation issued by an accreditation body that is a member of IAF
21.	Does the scheme documentation require that certification body undertake <u>forest</u> <u>management certification as "accredited</u> <u>certification</u> " based on ISO 17021 or ISO Guide 65 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	YES	 1 System regulation - «4.4. Certification bodies and auditors Forest management and chain of custody certification bodies performing corresponding audits in PEFC Russia system shall meet the criteria set forth in ISO 17021, ISO 19001, ISO 17065 and PEFC ST 2003 "Requirements for Chain of Custody Certification Bodies" 7. FM notification ND-001: All certification bodies shall be notified in PEFC Russia ND-001 and ND-002: certification bodies shall have valid accreditation Complies. Accreditation is required through notification requirement.
22.	Does the scheme documentation include a mechanism for PEFC <u>notification</u> of certification bodies?	Annex 6, 6	YES	1 System regulation - «7. PEFC RUSSIA NOTIFICATION OF CERTIFICATION BODIES

No.	Question	Reference to PEFC Council PROCED URES	YES / NO*	Reference to scheme documentation
				All certification bodies shall be notified in PEFC Russia.»
				7. FM notification ND-001:2015
				8 CoC notification ND-002:2015
				Complies
			YES	1 System regulations - «7 . PEFC RUSSIA NOTIFICATION OF CERTIFICATION BODIES
23	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6		PEFC notification procedures are supposed to be non-discriminatory for certification bodies.»
				Complies. ND-001:2015 and ND-002:2015 do not set restrictive requirements for notification. Note that ND-001:2012 recognizes only certification bodies that have a Russian accreditation.

PART V

*

PEFC Russia has adopted the international chain of custody standard (PEFC ST 2002:2013) as the only chain of custody standard in the System. Therefor the requirements set in PART V do not apply.

Part VI: Standard and System Requirement Checklist for <u>Scheme Administration Requirements</u>

2 Checklist

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
		PEFC Notifi	cation o	f certification bodies
1.	Are procedures for the notification of certification bodies in place, which comply with chapter 5 of PEFC GD 1004:2009, Administration of PEFC scheme? Quote: PEFC GD 1004:2009 PEFC notification of certification bodies 5.1 The notifying body shall have written procedures for the PEFC notification which ensure that :a) the PEFC notified certification body is meeting the PEFC Council's and PEFC endorsed scheme's requirements for certification bodies, b) the scope of the PEFC notification, i.e. type of certification (forest management or chain of custody certification), certification standards and the country covered by the notification, is clearly defined ,c) the PEFC notification may be terminated by the notifying body in the case of the certification body's non adherence to the conditions of the PEFC notification or in the case of the cancellation of the contract between the PEFC council and the authorised body, d) the PEFC	Chapter 5	YES	 7 FM notification ND-002:2015 (version 07.08.2015) 3. Conditions for notification Certification body shall have valid accreditation issued, by <u>accreditation body</u> that is a member of IAF and comply with the requirements of PEFC ST 2003 "Requirements for Chain of Custody Certification Bodies Contract on PEFC Notification of Certification Body (version 07.08.2015) Certification and accreditation procedures that are a part of any national PEFC endorsed scheme shall comply with PEFC requirements "PEFC GD 1004:2009 PEFC Administration" and PEFC ST 2003 "Requirements for Chain of Custody Certification Bodies". Written procedures for notification: see Normative documents ND-001:2015 and ND002:2015, for forest management and chain of custody respectively Complies.

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
	between the notifying body and the PEFC notified certification body ,e) the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System ,f) the PEFC notification does not include any discriminatory measures, such as the certification body's country of origin, affiliation to an association, etc.5.2 The notifying body may charge a fee for the PEFC notification. The authorised body shall inform the PEFC Council about the level of its PEFC notification fees, when requested.			
		PEFC	Logo u	sage licensing
2.	Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, <i>Administration of PEFC scheme</i> ?	Chapter 6	YES	 1 System regulation - «4.3. Labelling The Central Body of PEFC Russia system shall issue PEFC logo use licenses. PEFC logo shall be used in accordance with the provisions of PEFC ST 2001 "PEFC Logo Use Rules". The certification body shall control the use of PEFC logo and informs the Central Body of PEFC Russia about identified non-compliance. The PEFC Logo usage license shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008. Note: Where the PEFC certification covers several legal entities, for example where group and regional forest certification covers a number of forest owners / managers (independent legal entities) or where multi-site certification covers several sites which are legally independent entities, each legal entity shall apply for its own PEFC Logo usage license.

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
				PEFC Russia may issue a PEFC Logo usage multi-license to a holder of a multi-site chain of custody certificate, which covers the whole or a part of the multisite organization provided that:
				a) the central office and the sites are a part of a single legal entity or
				b) the central office and the sites are a part of a single company with a single management and organisational structure.
				Note: The multi-license cannot be issued to a multi-site chain of custody certificate holder where the sites are independent legal entities without a single management and organisational structure and where the multi-site organisation has only been created for the purpose of PEFC certification.
				PEFC logo use license can be issued on condition that:
				a) a written agreement is concluded between PEFC Russia and PEFC logo user;
				 b) PEFC logo user complies with the requirements of PEFC Logo Usage Rules (PEFC ST 2001:2008);
				c) the scope of PEFC logo use is clearly defined (groups of logo users).
				Note: PEFC Russia can terminate PEFC logo use license if logo user does not comply with PEFC Logo Usage Rules (PEFC ST 2001:2008) or in case of termination of contract between PEFC Council and PEFC Russia.
				In case of unauthorised use, the PEFC Logo usage license provides for contractual penalty of one fifth of the market value of the products to which the unauthorised logo use relates, unless the PEFC Logo user proves that such unauthorised use was unintentional. In the latter case, the penalty will be limited to 15,000 CHF.
				PEFC Russia Appeals Commission shall consider all cases of unauthorised PEFC logo use. On the basis of decision taken by Appeals Commission, PEFC Russia shall send a letter of notification to PEFC logo user and inform him on

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
				 the necessity to eliminate violations of PEFC Logo Usage Rules (PEFC ST 2001:2008). The following coercive measures can be taken to rules breaker: PEFC Logo usage license termination; penalties; legal proceedings to protect PEFC logo.» Complies. Copy of PEFC requirement. The currency of the penalty is recommended to be updated in line with PEFC Council guidance.
		Complain	ts and c	dispute procedures
3.	Are complaint and dispute procedures go usage licenses in place, which comply with chapter 8 of PEFC GD 1004:2009, Administration of PEFC scheme? Quote: 1 The PEFC Council and the authorised bodies shall have written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme.8.2 Upon receipt of the complaint, the procedures shall provide for: a) acknowledgement of the complaint to the complainant, b) gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint, c) formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties	Chapter 8	YES	4 Appeal procedures «4. Objectives and functions of Appeals Commission 4.1 The main objective of Appeals Commission is handling appeals (complaints, claims) related to the activity of System participants (except certification and accreditation bodies), the forest management standard setting and revision procedures, interpretation of forest certification standards and PEFC logo use.» <i>Complies The written procedures comply with the PEFC requirements.</i>



Appendix 2

Stakeholder questionnaire



Опрос заинтересованных сторон

Данный опрос был составлен с целью определения точки зрения заинтересованных сторон на развитие национальной схемы лесной сертификации PEFC. Особое внимание в опросе уделено методологии развития стандартов устойчивого лесоуправления.

Помимо прочего, PEFC предполагает, что редакция стандарта должна быть прозрачным процессом, открытым для всех заинтересованных сторон; подчеркивает необходимость обсуждения и документации различных точек зрения, а также принятия решения по критериям сертификации на основе консенсуса.

Данный опрос будет выслан всем сторонам, причастным к редакции стандарта, и мы надеемся, что Вы сможете поделиться с нами Вашей точкой зрения относительно процесса редакции и, тем самым, улучшить качество и ценность беспристрастной оценки схемы в рамках PEFC.

Совет PEFC также открыл общее обсуждение схемы и процесса ее разработки в режиме online. Обсуждение доступно для всех заинтересованных лиц на странице www.pefc.org/standards/endorsement-mutual-recognition/assessments

Stakeholder questionnaire

This questionnaire is prepared to collect stakeholders' views on the development of national PEFC forest certification scheme. The questionnaire focus on procedures applied in the development of standards for sustainable management of forests.

PEFC requires, among other, that standard development shall be transparent and open to all interested stakeholders; different views shall be discussed and documented and decisions on certification criteria shall be made in consensus.

The questionnaire will be sent to all parties involved in standard setting and we hope you can share your views on the development process and thus improve the quality and value of impartial scheme assessment under the PEFC framework.

PEFC Council has also opened an online general consultation on the scheme and its development process. The consultation is open to any interested party and can be accessed in <u>www.pefc.org/standards/endorsement-mutual-recognition/assessments</u>



Questionnaire on the Development Forest of Certification Schemes

Опрос по разработке схем лесной сертификации

1. By whom and when were you invited to participate to the development of the standard for PEFC Forest certification? Кем и когда Вы были приглашены к участию в редакции стандарта лесной сертификации PEFC?

Ву whom: Кем	Comments Комментарии
When: Когда	Comments Комментарии

2. In your view, were all interested parties given the possibility to participate and contribute to the scheme development and revision? Как Вы считаете, всем ли заинтересованным сторонам была предоставлена возможность поучаствовать и внести свой вклад в разработку и редактирование схемы?

- if you deem that some parties were neglected or prioritised, please comment

если Вы считаете, что некоторые заинтересованные стороны были проигнорированы или же кому-либо было оказано особое предпочтение, пожалуйста, прокомментируйте

Yes Да	No Нет	Comments Комментарии



3. Did the organiser provide you with adequate material to participate in the standard development before and during the process? Предоставил ли Вам организатор необходимые материалы для участия в редакции стандарта до и в течение процесса?

Yes Да	No Нет	Comments Комментарии

4. Was the development and revision process well planned and structured? Был ли процесс разработки и редактирования хорошо спланирован и структурирован?

Yes Да	No Нет	Comments Комментарии

5. Did the process follow procedures or rules that were informed to participants in advance? Соответствовал ли процесс той информации о методологии и правилах, которая была заранее предоставлена участникам?

Yes Да	No Нет	Comments Комментарии



6. Were the views and opinions of different parties in standard setting taken into consideration as appropriate during the standard development? Были ли приняты во внимание точки зрения и мнения различных сторон в процессе редакции стандарта?

Yes Да	No Нет	Comments Комментарии

7. Were the criteria (requirements) in the standard agreed on in consensus? Были ли критерии (требования) стандарта приняты на основе консенсуса?

Yes Да	No Нет	Comments Комментарии

8. Did the participating stakeholders represent the range of interests in forest use in your country? If not, which other interests groups should have participated? Представляли ли участники весь спектр интересов лесопользования в Вашей стране? Если нет, какие другие группы заинтересованных лиц должны были принять участие?

Yes Да	No Нет	Comments and proposals	Комментарии и предложения



9. Were there any dispute settlement procedures in case of conflicting views between members of standard setting working group? Существовал ли какой-либо порядок разрешения споров в случае возникновения конфликта точек зрения среди участников рабочей группы по разработке стандартов?

Yes Да	No Нет	Comments and proposals	Комментарии и предложения

10. Do you believe any aspects of the scheme deserve further consideration? Считаете ли Вы, что некоторые аспекты схемы заслуживают дальнейшего рассмотрения?

Yes Да	No Нет	Comments and proposals	Комментарии и предложения



*Which of the following parties best describes you or your organisation? Какая из перечисленных групп наилучшим образом описывает Вас или Вашу организацию?

Yes Да	Representing: Вы представляете
	Administration Администрацию
	Authorities Органы управления
	Environmental non-government organisation Экологическую неправительственную организацию
	Forest Industry Лесную промышленность
	Forest owner / manager Лесовладельца / лесоустроителя
	Research institute Исследовательский институт
	Social non-government organisation Общественную неправительственную организацию
	Trade Торговлю
Other	Specify: Уточните какую
Другую	



Appendix 3

List of stakeholders contacted



Indufor ...forest intelligence

Organisations contacted in national consultation during the assessment	
WG members and participants in active discussions (pointed out by PEFC Russia)	
Khabarovsk Forest Certification Centre	
Stroiles-2	
Metsa Group	
Bureauveritas	
Russian Research institute for Silviculture and Mechanization of Forestry (VNIILM)	
Russian forest protection center	
Saint-Petersburg State University	
Mondi	
Industrial safety	
Pulp and paper	
Arkhangelsk CBK	
Investlesprom	
Volga	
Solikamskbumprom	
Kondopoga	
Knauf Saint-Petersburg KPK	
Sawn timber	
Ust-Ilimsky	
Lesozavod 25	
Lesosibirsky No. 1	
MM Efimovsky	
Plywood	
Fanplit	
Permsky	
Novator	
Ust-Izhorsky	
Fiberboard	
Kronospan	
Kronostar	
Poleko	
Environmental NGOs	
Russian ecological center	
Center for Russian Environmental Policy	
Russian ecological party "Zelyonye"	
WWF Russia	
The center for provision of ecological control	



Non-governmental ecological Fund of Vernadsky IUCN Russia Greenpeace Russia Green world Rosohotrybolovsoyuz - Association of Hunters and Fishers

Association of indigenous peoples of Russia

Rosleszashchita- Federal center of forest protection



Appendix 4

Panel of Expert Comments on the Indufor Report on the "Conformity Assessment of the Russian Forest Certification System with PEFC Requirements, Final Draft Report v2"

Panel of Expert Comments on the Indufor Report on the

"Conformity Assessment of the Russian Forest Certification System with PEFC Requirements, Final Draft Report v2"

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

- i. Whenever an PoE identified an error, conflicting conclusion, or other comments that improved the report, the appropriate changes were made to the final report and relevant Appendices.
- ii. When PoE challenged the conclusion made on a compliance, it was considered and reviewed against the applied assessment principles e.g. regarding the validity of the different versions of System documentation in the assessment.
- iii. A description of potential changes made or not made with justification was given to support the consultant's response.
- iv. Editorial and grammatical corrections are not listed in this table.
- v. Recommendations to change the English translation of the Russian standard text are not taken into account, because the consultant cannot make any changes to the standard.

Numb er	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
1.			The report is clear and well structured, gives a	
2.			clear view of the Russian revision process! The assessment of the FCR is a comprehensive thorough study. It is based on a desk study (of the relevant documents) and a questionnaire as well as on telephone calls and electronic communication. It clearly points to the several weaknesses of the system, which have to be communicated to PEFC Russia! It although makes essential a qualified recommendations for improvement for the next (5 year) period. Thus the assessors' notes are important The assessment had to deal with several unusual situations, f. e. the production of a final draft version during the ongoing assessment and an interruption of the process leading to a draft final version. It although had to check the Russian version against the	

Numb er	Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
			English translation (because of some figures and quotations).	
3.			Report well structured. Missing references (e. g. with non-conformities) make it sometimes difficult to get ones way through the report. Some partial non-compliances or necessary improvements not respectively classified and summarized (e. g. in "Recommendation").	References have been added and recommendations summarized in Chapter 2.
4.			I do share the worry about too many PEFCC's quotations without further Russia's specific circumstances, although they are justified in some cases (explicitly). I am even more worried about the remaining uncertainties in the decision making - voting process of the Russian bodies developing the renewed standard, and I am surprised that some of the international ENGO's (Greenpeace, WWF, IUCN, IUFRO, etc.) did not contribute at all although Russia cooperates actively with some of them, I wonder whether translations into other languages used in Russia have been discussed and I am missing international conventions apart from ILO (such as W.A., CBD, etc.) and the link/ relation of Russia's Red Data Books to the international once (lists produced and kept with IUCN). As stated in the assessment there is a lack of environ. + social expertise, a lack of information about meetings etc. (data, member of participants, results of discussions, etc.). The rather limited responses to the questionnaire as well as contributions towards the renewed standard	Indufor has summarized recommendations for PEFC Russia in Chapter 2, where it clearly pointed out that direct quotations of the PEFCC documents are to be avoided and transparency of decision-making processes was not satisfactory. The question regarding ratification of international conventions has been replied to in question 81. In species protection PEFC does not specifically require assessment of the credibility or compatibility of national species list with international ones. CBD Convention address the issue at an international level.

Numb Report er chapter / page		PoE member comment	Consultant's response
		have to be considered seriously. In general I do agree with the assessors' recommendation to the board PEFC (and I shall bring up some points at the PoE conference on 30.09.2015).	
5. Report 1.2 p.2	Background	More background information could be justifiable to clarify why the assessment process of the revision took so long and why it is acceptable from the consultant's point of view to accept documentation for this assessment, which is written after the Russian revision process (and even during the assessment process)	The content documentation submitted initially by the PEFC Russia was partly outdated (made reference to the material of previous assessment, had several conflicting documents e.g. on standard setting rules. Thus Indufor requested better specification which documents are the revised and apply to this assessment. The assessment was interrupted in order to provide the PEFC Russia time to sort out the documentation. The resubmitted documents had still a number of gaps in information and in evidence on the participatory standard setting. These gaps were communicated to PEFC Council and further to PEFC Russia that provided further clarification on participatory process and also made amendments to the accreditation requirements. The major irreversible concerns lied in the participatory process and repeated
			Russia time to sort of documentation. The resubmitted doc number of gaps in intervidence on the part setting. These gaps of communicated to PE further to PEFC Russ further clarification of process and also ma the accreditation require The major irreversible

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				compliance. The gaps in technical procedural documents have been improved along the assessment process.
6.	Report 1.3. 6. p.3	This final draft report is based on the updated documents of March 2015 and August 2015, but in standard setting procedures also documents applicable in 2013 – 2014, at the time of the standard setting, are taken into consideration.	The fact here is that the standard setting process in 2012-13 is mainly assessed against documents prepared in 2015 – and partly against documents applicable in 2013-2014! Normal procedure should be to assess the revision process against already existing documentation! This fact is the confusing red line in the whole assessment report!	In standard setting the assessment focus on the written procedures (rules) and implemented process. The rules were improved during the assessment to meet with PEFC requirements. In 2013 -2014 the scheme had the two conflicting documents for standard setting where one was more compliant than the other. Thus the assessment had to focus on the activities done in standard revision. To get and understand the evidence on implemented participatory processes took time and required clarifications.
7.	Report 2, p. 4	the content of the "Recommendation"	After reading through the report and the Appendix, I am the opinion that the consultant's recommendation is not fair. There are three "minor non-conformities" identified by the consultant. However, going through the Appendix, there are several comments by the consultant which de facto can be and shall be interpreted as "non-conformities". This fact in mind, my proposal is that the recommendation should be more conditional. There should be clear conditions to be fulfilled until positive recommendation is possible. If the consultant is not able to formulate strong enough	The main concerns in the compliance of the Russian System relate to the participatory elements in standard revision. The working group deciding on standard was not representative but assessor was repeatedly informed that no other parties were interested to participate. In addition, <u>evidence shows that</u> <u>stakeholders were widely informed</u> <u>about the process</u> . However, it does not fully support that they were invited to

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			conditions to clarify the many non-conformities, the recommendation could also be: "not to endorse the Russian revised scheme". Reasoning behind my opinion is the following: Russia has huge forest resources and has received a lot of criticism during the years against applied forestry operations especially in intact forests. If PEFCC can accept the revision process used in Russia, criticism against PEFC-certification can increase heavily and its credibility can be questioned. Two issues in the Russian revision process will get the most critics: the small and non- balanced standard-setting group, and the poor documentation both of the standard setting process and the national system description.	 make decisions on the standard or to comment it. On the other hand, the stakeholder survey carried out by the consultant did not complain about limited participation possibilities. In this case, one cannot state conditional terms for standard setting. A number of comments in Appendix 1 relate to requirements that PEFC Russia has copied as such from PEFC Council Technical Documentation. This is not encouraged by PEFC Council, but if adaptable into national context, they do not raise a non-compliance. Recommendations presented in Chapter 2 state now that minor non-conformities to specific PEFC requirements on standard setting should be addressed and corrected for the following revision cycle.
8.	Report 2, p. 4	the content of the "Recommendation"	In any case, in the recommendation, there should be a list of non-conformities following proposals of the consultant, how to solve these.	Corrected. A list of non-conformities is now complemented by a list of Indufor's recommendations to PEFC Russia in Chapter 2.
9.	Report 4.3, p. 10	Content of the table 4.3	This is very clear and informative table and gives a clear view on, which are the core issues in the revision process!	
10.	Report	During the standard revision in 2013 -	This chapter clarifies how the revision process	

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	5.4 p. 13	2014 the FCR System documentation required that PEFC Russia shall initiate standard revision and that the standard shall be developed by a working group. However, the documentation was inconsistent in defining the rules and mandate of such working group.	took place: there were no clear rules for the process and the rules where then copied from the PEFCC documentation afterwards! Non- existing rules made the process very confusing, as can be read in the report.	
		The updated rules for standard setting, review and approval (Document 2 of 2015) follow closely PEFC requirements often by word, with very limited specifications for national adaptation.		
11.	Report 5.4 p. 13	The Forum Statutes required a balanced stakeholder working group that is accessible to any stakeholder group and it gives the Forum a mandate to decide on the content of the standard in line with PEFC requirements. The Rules for Standard Development also require a working group but gives the Forum a role only in the consultation. In principle both documents require stakeholder participation in standard setting. This confusion on the requirements led to the request to clarify the documentation during the interruption period of the assessment.	The consultant has done good work in consulting the Russian PEFC to improve their system documentation as well as the standard setting procedures. However, this consultancy work should have been done already before the revision process began. One target for PEFC-certification should be credibility and reliability. In order to reach the target, homework in each individual member- country must be done!	For PEFC Council to consider
		In current documentation the Document 3 of 2015 - Regulations on the Working Group for Consideration, Review, and Adoption of Forest Management		

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		Standard of Voluntary Forest Certification System of PEFC Russia. 2015 - defines the rules and mandate for the stakeholder working group.		
12.	Report 6.1.1 p. 14	 PEFC Russia System Regulation (document 1), standard setting rules (document 2) and working group regulations (document 3) set conforming regulations to standardizing body and its written procedures The System regulations (document 1) 	These are self-evident, because these documents have prepared in 2015 mainly by copying PEFCC documents! Same fact for all "Procedure complies with PEFC requirements"-decisions! pp. 14-18	Indufor recommended PEFC Russia to avoid direct copying of PEFC documents but rather adapt them to the national context (Chapter 2 "Recommendations").
		require PEFC Russia to initiate periodic revision of the standard and Standard setting rules (document 2) require publishing of the revision process in Internet and/or mass media		
13.	Report 6.1.2 p. 18	Most members in the small working group were content with the access to the material but at the same time not all of them were familiar with the standard setting procedures. They also had the possibility to comment draft but their comments were not always thoroughly discussed and taken into consideration.	The consultant's decision is "complies with PEFC requirements", but the opposite view could also be possible	The assessment prioritized the fact that material was shared, although not efficiently and systematically with the objective to get informed opinions for discussion. The minutes of the working group meetings as late as 2015 are also an evidence on poor documentation.
		The minutes of the working group meetings in 2012-2013 (in person or telephone) were not available. The minutes of the meetings held during documentation update in 2015 do not contain information on the discussed		The changes made to the forest management standard in 2015 and decided in the above mentioned meetings, where editorial, which allows minor flexibility to the decision making on conformity related to information

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		issues		sharing within the working group of 5 members.
14.	Report 6.1.3 p. 19	The first public consultation published in Internet was held in summer – October 2013. Second consultation for technical comments was opened from November 1, to December 31, 2013. The third consultation on the technically updated standard of 2015 was held during the assessment in November 20, 2014 to January 20, 2015. Only the first consultation allowed expression of substantial comments that would have a larger impact on standard requirements. The comments are available only from one consultation.	The consultant's decision is "complies with PEFC requirements", but the opposite view could also be possible	PEFC requires one public consultation that lasts for 60 days. The public consultation meets with that requirement.
15.	Report 6.3.2 p. 24	Insect damages and forest fires are common in Russian forests.	This is the fact, but the Russian standard does not have any specified means to prevent or to fight against forest fires. Like the consultant states in several places in Appendix1, the Russian standard is more a copy of the PEFC general standard, than a national one.	Copying of text to national standard or system documentation is always pointed out in the assessment because it is not encouraged by the PEFC Council, but if adaptable into national context, copied text is not a reason raise a non-compliance.
16.	Report 6.3.2 p. 25	 The Russian Federation has not ratified the ILO Convention on Indigenous and Tribal People (Table 6.2), thus the key requirements of that convention should be included in the FCR standard (see FCR Criteria 6.5 and 6.9). ✓ <u>Conforms</u> to PEFC Checklist Part III requirements 5.6.1 - 5.6.14. 	There are several groups of indigenous peoples living in the Russian forests – so the issue is important. To me, the Russian revision document only partly conforms at the present stage.	The PEFC Russia was requested to inform how indigenous peoples' groups have been informed and provided with opportunities to participate in standard setting. The evidence shows a number of indigenous groups were contacted by email.

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17.	Appendix		This statement means that the PEFC Russia	The forest management standard sets several criteria that requires among other, consultation, compensation, information sharing, and grievance procedures accessible to indigenous people. In addition it requires compliance with ILO 169 Convention and protection of customary rights. As stated earlier, the two parallel
17.	1, Part I, 2 Checklist 4.1. p.8	Complies. The procedures to deal with disputes on standard setting are defined in 3. Appeals procedures In earlier PEFC Russia documentation	documentation, which was valid when the revision process took place, does not comply with PEFC requirements, but then during the assessment process revised documentation does comply!! This is a method which is not	documents on standard setting did not comply did not comply with PEFC requirements. Due to the two simultaneously valid and
		Annex 13 Rules of Standard Development does not comply with the requirement, but Annex 4 Forum statutes did.	acceptable! For me the answer for this question of the checklist is NO – does not comply! The last sentence of this statement of the consultant is unclear, because I cannot find document "Annex 4 Forum statutes" in table 3	conflicting sets of standard setting documentation the process was interrupted. The procedures were revised during interruption and amended thereafter.
			on page 3 of the Appendix 1. In the report, however, there is the table 4.1, which lists the same Russian documents, and there Annex 13 and Annex 4 are mentioned. They were in force during 2013-2014, but annex 13 only from Feb. 2014!! I propose that these two tables could have the	With this background and with the new procedural documents provided with the consent of the PEFC Council, <u>the procedural requirements (for future) are assessed against the latest documentation issued in 2015</u> .
18.	Appendix		Same comment as above! – For me the	Consultant checked that both tables have the same content and made sure that Annex 4 Forum statutes could be found from table 3 of the Appendix 1 See question 17 for explanation
10.	Abbennix	Current rules comply		

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er	chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	1, Part I, 2 Checklist 4.2 p. 9	Earlier Annex 13 Rules of Standard Development did not comply	answer for this question of the checklist is NO – does not comply!	
19.	Appendix 1, Part I, 2 Checklist 4.2 p. 9	First information on the new revision process was made in January 2012 on PEFC Russia web site; <u>www.</u> pefc.ru. The standard setting rules (document 2) were made available. The standard setting rules published in 2012 in PEFC Russia website were almost identical to the rules in Annex 13 submitted to the assessment in 2014 prior to the interruption.	"Rules published in 2012 (document 2)" – this document is not listed in table 3 on page 3 of the App.1, nor in table 4.1 on pp.8-9 of the report!	This document has not been listed as the assessor reviewed the latest documentation issued in 2015. A reference to the Document 2 is deleted. "First information on the new revision process was made in January 2012 on PEFC Russia web site; www. pefc.ru. The standard setting rules used at the time of the revision process were made available to the assessor".
20.	Appendix 1, Part I, 2 Checklist 4.3 p.10	Complies Earlier procedures on standard setting (Annex 13 Rules of Standard Development or Annex 4 Forum Statutes) did not comply	Same comment as above! – For me the answer for this question of the checklist is NO – does not comply!	See question 17 for explanation
21.	Appendix 1, Part I, 2 Checklist 4.4 a and b p.11-14	4.4 a: Process: YES , NO Minor NC 4.4 b: Process: YES complies	If 188 stakeholders have been identified and invitations sent and only 5 positive reactions received, there must be something odd in the way the process has been carried out! In certification it is almost obligatory, that environmental interests are somehow represented – and this is not the situation in the Russian case – and Russia is one of the countries rich of forests which has long been criticised by undesirable use of intact forests! – And out of the five persons two are	Unrepresentativeness and small size of standard setting working group raised concerns in the assessment. <u>There is</u> <u>no evidence that any party informed</u> <u>were denied access to participate</u> . Over 200 parties were informed by email, seminars or phone. It is evident that the <u>invitation</u> was not proper as it <u>was not</u> <u>efficient</u> . <u>The fact that the outcome was</u> <u>not the desired one does not justify a</u> <u>major non-conformity</u> , although it

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			representatives of the forest industry! Minor Non-Compliance is justifiable	hampers the standard setting process.
22.	Appendix 1, Part I, 2 Checklist 4.5 p.16	Current procedures comply with PEFC Earlier document Annex 3 Appeals Commission did not comply	Same comment as above! – For me the answer for this question of the checklist is NO – does not comply!	See question 17 for explanation
23.	Appendix 1, Part I, 2 Checklist 4.5 a p.17	Procedure complies and was in use during the standard setting (see earlier document Annex 3 Appeals Commission did not comply)	The procedure was in use although the procedure document was formulated after the revision! Very odd situation.	The standardising body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities, which are accessible to stakeholders". Back in 2013, System regulations and Standard setting rules stated a possibility to appeal and referred who appeals could be addressed to, but not explicitly procedures. Revised standard setting rules comply with the requirement (Rules and Programme for PEFC Russia Standard Setting of March 2015) Revised grievance procedures also recognize appeals raised on standard setting procedures.
24.	Appendix 1, Part I,	Procedure complies	i.e. earlier documents do not comply!	See question 17 for explanation
	2 Checklist	Earlier Rules of Standard Development (Annex 13) did not require identification	Same comment as above! – For me the answer for this question of the checklist is NO	

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	5.1 p.18- 19	of relevant stakeholders prior to revision.	– does not comply!	
25.	Appendix 1, Part I, 2 Checklist 5.2 p.19	Procedure complies. Copy of PEFC requirement. Earlier Rules of Standard Development (Annex 13) did not require identification of disadvantaged stakeholders	i.e. earlier documents do not comply! Same comment as above! – For me the answer for this question of the checklist is NO – does not comply!	The PEFC Russia was requested to inform how indigenous peoples' groups have been informed and provided with opportunities to participate in standard setting. The evidence shows a number of indigenous groups were contacted by email. Disadvantaged groups were not identified specifically, but a number of these were included in the 188 stakeholder information list.
26.	Appendix 1, Part I, 2 Checklist 5.3 p.20- 21	Substantially the procedure is identical to PEFC requirement. The negative conclusion is based on the fact that the procedure is not adapted to the national context. Public announcement looks for measures that ensure adequate reach of different interest groups. PEFC Russia specified the web site and included other mass media that is a broad concept. Complies. The text is a <u>copy</u> of the PEFC requirement, but gives some specifications how to implement it in Russia.	First conclusion of the consultant is negative, but then positive!? It is difficult to find any specifications for especially Russian implementation in the checklist	The specification that an invitation for participation and start of the standard setting process will be informed in web site, with the URL (<u>www.pefc.ru</u>), and other mass media is considered to be additional national adaptation of the PEFC requirement.
27.	Appendix 1, Part I,	Procedure is a copy of PEFC requirement – being a detailed	The comment after the decision of the consultant ("complies") can be understood as	See question 17 for explanation

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	2 Checklist 5.3 b, p.22	requirement a copied text complies. Earlier documentation did not set requirements on the content of invitation	"does not comply"	
28.	Appendix 1, Part I, 2 Checklist 5.3 c, p.23	Note that the standard setting documents applicable in 2012-2014 (Annex 13) did not include the requirements. However, the procedures are assessed against the documents submitted after the interruption in March 2015. Complies.	The comment of the consultant means, that earlier documents do not comply!	See question 17 for explanation
29.	Appendix 1, Part I, 2 Checklist 5.3 d, p.23-24	Earlier standard setting requirements (Annex 13) did not require the information in the invitation Complies.	The comment of the consultant means, that earlier documents do not comply!	See question 17 for explanation
30.	Appendix 1, Part I, 2 Checklist 5.4, p.25	The text is copy of PEFC requirement Earlier documentation (Annex 4 Forum Statutes, Annex 13 Rules of Standard Development) valid during standard revision did not require Annex 13 Rules of Standard Development review of the process prior to its implementation Conclusion: the procedures valid during standard revision did not require consultation on standard setting procedures. The current procedures are identical to PEFC requirements and will comply in the future standard setting processes.	Current procedures comply, but earlier do not comply?	See question 17 for explanation

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31.	Appendix 1, Part I, 2 Checklist 5.5 b, p.27	Questionnaire to working group members demonstrated that WG members had the possibility to give comments to the drafts, which, however, were not always taken into consideration WG minutes during the standard revision in 2013-2014 were not available, the minutes of telephone meetings in 2015 during the finalization of the standard record the title and parties involved in the discussion. Note that the standard finalization took place during the PEFC endorsement assessment.	The last comment of the consultant gives the impression that the requirement "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" hardly could have been fulfilled -> minor non-compliance?	There has been no evidence that some working group members have been denied a possibility to comment on the drafts, therefore the process complies with the requirement. However, a need for better transparency of decision- making has been pointed out during the assessment.
32.	Appendix 1, Part I, 2 Checklist 5.6 a, p.28	Complies. Copy of PEFC Requirement. The suitable media and timely manner should be defined.	The last comment of the consultant shall be included in the report, p.19 (6.1.3) as a proposal of the consultant to improve the revision process	Addressed as the recommendation to avoid copying text but rather adapt to the national context (Chapter 2).
33.	Appendix 1, Part I, 2 Checklist 5.6 a, p.28	Note that the third PEFC conformity assessment was ongoing during the second consultation. Compliant	The last comment of the consultant gives the impression that the requirement "the start and the end of the public consultation is announced in a timely manner" hardly could have been fulfilled -> minor non-compliance?	The first two consultation rounds complied with the PEFC requirements. PEFC Russia did mainly editorial changes to the standard in 2015 and carried out a consultation in November 20, 2014 to January 20, 2015 prior to their approval.
34.	Appendix 1, Part I, 2 Checklist	Synopsis of the comments and their consideration is available for one consultation.	No reference to any Russian documentation!	A reference has been added "Synopsis of the comments and their consideration is available for one consultation (see Summary of remarks to standard

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35.	5.6 f, p.32 Appendix 1, Part I, 2 Checklist 5.8 a, p.33	No evidence on any face to face meetings or voting in the decision- making stage	Procedures are copies of PEFC documentation made in 2015 and for the process there does not exist any evidence of consensus decision making!!? – same for 5.8 b and c!!	proposal (document 17)." There is an evidence on meetings or voting - protocols of phone conferences submitted by PEFC Russia in March 2015 (and dated 29.01 and 3.02.2015) – which indicate that all members have voted on decisions unanimously.
36.	Appendix 1, Part I, 2 Checklist 5.10, p.36	Complies. Copy of the PEFC requirement. The relevant mass media and publicity of standard setting/revision procedures and relevant records (minutes, etc.) should be defined more in detail to ensure good adaptation at a national level	The last comment of the consultant shall be included in the report, p.20 (6.1.5) as a proposal of the consultant to improve the revision process	Addressed as the recommendation to avoid copying text but rather adapt to the national context (Chapter 2).
37.	Appendix 1, Part I, 2 Checklist 5.10, p.36	Standard setting rules were placed in Internet (pefc.ru) in 2012 attached to an announcement. Information on the public availability of the minutes is not given. Selected few minutes were made available to the assessor.	Is the requirement "Documentation on the implementation of the standard-setting process shall be made publicly available" fulfilled, if standard setting rules are in internet? -> minor non-compliance?	Availability of standard setting rules in Internet is considered to be adequate if supported with information on the revision process in seminars, public media or other fora. PEFC Russia complies with this requirement.
38.	Appendix 1, Part I, 2 Checklist 5.12, p.37	On the 24th of February, 2015, Standard and other documents were placed at website <u>www.pefc.ru.</u> Note that the standards were not placed in Internet in a timely manner right after the approval in 2014 when the endorsement assessment started, thus the system regulations were not fully complied with	This comment of the consultant gives me the impression that the requirement "The formally approved standards/normative documents shall be published in a timely manner and made publicly available" is not fulfilled! -> non-compliance?.	The forest management standard approval was informed to public but it PEFC Russia could not provide an evidence that it had been place in Internet. The minor changes made to the SFM standard (currently in force) were promptly published in Internet.

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		Currently complies		Taking into consideration that the current standard version is published in line with the requirements a complying conclusion is drawn.
39.	Appendix 1, Part IV, 2 Checklist	There are some comments (proposals) of the consultant, like "Complies. However, PEFC Russia should make specific and correct references on the CoC certification and the requirements for CoC bodies." (p. 91)	Should the proposals made in Part IV be included also into the report in order to be noticed!?	Identified deviations are compiled into a list of recommendations (Chapter 2) and pointed out in the text of the report.
40.	2/4	However, the System has some minor non-conformities to specific PEFC requirements on standard setting (4 bullets listing the NCs)	Please give a reference to the respective chapters in the report / appendix and the PEFCC requirements. At the current stage details to these NC are hard to identify: in the following report only 3 minor NCs are described (pages 17 and 18) and in the appendix not all of them could be identified either. The use of slightly different wording describing the same issue in the report and appendix makes it even more difficult.	References to the respective part of Appendix 1 in case of non-conformities are added to the report (Chapter 2).
41.	3.2 / 5	The current procedures for standard setting as well as the stakeholder participation in practice comply with PEFC requirements; however,	As these are minor NC (according to chapter 2) it should be questioned if compliance is given (as stated here). If the procedures comply, the identified deviations should be characterized as observations only.	The assessor concluded that a positive endorsement recommendation can be given in the presence of minor non- conformities, that are clearly described for the consideration of PEFC Council. In case of Russian System the non- conformities relate to the early stage of standard setting process and cannot be corrected. No change
42.	6.1.2 / 18	The minutes of the working group	This requirement does comply although	The assessor concluded that minutes

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		meetings in 2012-2013 (in person or telephone) were not available. The minutes of the meetings held during documentation update in 2015 do not contain information on the discussed issues.	minutes not available / no content of information?	(in the 2015 technical standard update) where available but their content was not satisfactory. The absence of minutes is a non- conformity. Lack of satisfactory minutes is raised as a minor non-conformity.
43.	6.1.3 / 19	The rules do not specify the media or information procedures on public consultation, nor do they describe how the received comments are discussed and addressed. Despite of the potential for improvement the procedure meets with the set requirements.	In my opinion the described deviations rectify at least an observation.	The PEFC Russia has copied several parts of PEFC Technical Documentation to the PEFC Russia documents. PEFC Russia shall in any future modification avoid direct copying without specifying as appropriate, how any general PEFC requirement is applied in the national context. The issue of copying is raised in Chapter 2 (Recommendations).
44.	6.2 / 22	Functions and responsibilities of a group entity: (Bullet 2): Lesnichestvos represent group organisation ((a) but it is not obliged to provide a commitment on behalf of the group or to follow written management procedures. Nor should it keep records ((d).	Are the requirements fulfilled despite the mentioned deviations? If the given facts ("not obliged to provide" / "nor should it keep records") are no deviations, why are they mentioned in this context?	PEFC Russia corrected the group certification rules (PEFC system regulations, document 1) in August 2015. Currently the requirements also apply to Lesnichestvos.
45.	6.3.2 / 25	However, The Russian Federation has not ratified the ILO Convention on Indigenous and Tribal People (Table 6.2), thus the key requirements of that convention should be included in the	The wording "Should be included" is misleading, as the requirements are included (as described in detail in the Appendix, p. 77, requirement 5.6.4).	The wording has been changed and a reference to the requirement inserted. "Russian Federation has not ratified the ILO Convention on Indigenous and Tribal People (Error! Reference

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		FCR standard (see FCR Criteria 6.5 and 6.9).	Please make a reference to the requirement 5.6.4 in the Appendix that the reader finds it more easily.	source not found.), but the key requirements of that convention are included in the FCR standard (see FCR Criteria 6.5 and 6.9 and Appendix 1, requirement 5.6.4)."
46.	7.1 / 29	First para: A full list of stakeholders invited for participation in the survey is presented in the Appendix 3.	In Appendix 3 only 29 are listed and I would recommend to list all.	All 38 stakeholders - 5 members of the Working Group, 4 active participants indicated by PEFC Russia and 29 other stakeholders are now listed in the appendix 3.
47.	7.1/34	Table 7.2 The small size and unrepresentativeness if the working group is raised as a NC	Please make a reference to the report chapter / appendix chapter explaining this NC or other issues.	"Unrepresentativeness and small size of standard setting working group raised concerns in the assessment. Nevertheless, there is no evidence that any party informed was denied an access to participate. Over 200 parties were informed by email, seminars or phone. It is evident that the invitation was not proper as it was not efficient. The fact that the outcome was not the desired one does not justify a major non-conformity, although it hampers the standard setting process". "The lack of information on standard
				setting process is discussed in the assessment (classified as a minor non- conformity in the Appendix 1 5.5 c

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		Also the lack of information on standard setting process is discussed in the assessment Addressed in the assessment as lack of participatory decision making meaningful means to contribute The assessment raised the need to adapt too general or copied requirements to national context in order to assure their applicability at forest management unit level.		Procedures)" "Addressed in the assessment as lack of participatory decision making meaningful means to contribute (classified as a minor non-conformity in the Appendix 1 5.5 c Procedures)" "The assessment raised the need to adapt too general or copied requirements to national context in order to assure their applicability at forest management unit level (Chapter 2 Recommendations)". The references are added
48.	Appendix I / 10	Requirement 4.3: Complies, although the recording could be improved	Again the improvement of recording is mentioned. Please check whether this issue should be listed at least as an observation and fed into the chapter 2 "recommendation" of the report.	Issue listed as an observation and added to Chapter 2.
49.	Appendix I / 11	YES / NO minor NC	What does that mean?	Corrected in the final: "YES"
50.	Appendix I / 22	5.3 a The mail screenshot (5.6. b) not previously available demonstrates that	Which mail screenshot? Where exactly is this presented?	Corrected in the final: "The mail screenshot provided by PEFC Russia in the course of the assessment demonstrates that invitations were sent

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		invitations were sent a range of stakeholders in addition to its dissemination in the regional seminar.		a range of stakeholders in addition to its dissemination in the regional seminar. The screenshot is inserted to the checklist.
51.	Appendix I / 37	Requirement 5.12 " in a timely manner"	Is there any reference in the documentation of PEFC Russia detailing / mentioning "timely manner"?	Addressed in the recommendation related to the gaps due to copied text (Chapter 2).
52.	Appendix III / 70	Requirement 5.4.9: Non-compliant. Copy of PEFC Complies. Reference to Forest Code establishes a compliance.	These two statements are somewhat confusing. If requirement is satisfied but due to wording is not compliant I recommend to classify it at least as an observation.	YES Final draft report pointed clearly out copied PEFC requirements because copying is discouraged by the PEFC Council. In the final report the implications of copied text were assessed case by case. In this case the copied text was applicable and non conformity was removed.
53.	Appendix III / 74	Requirement 5.5.3: Pressure of animal population is not either addressed, a statement is needed.	This indicates that the requirement is only partly satisfied. Recommendation to classify it as a minor non-conformity.	Compliance with all other five requirements is deemed to justify a complying conclusion. Animal pressure on forests is not a major problem in Russian forest management. PEFC Russia was requested to provide clarification on the issue but it was not given. The conclusion was not changed.
54.	Appendix III / 78	Requirement 5.6.7: Non-compliant. A copy of PEFC	There are two opposite decisions of the consultant: "non-compliant" and "complies". Some new wording to clearly express the final decision.	Relates to copying of the text from PEFC Council documentation. Addressed as described in question 15 on copying

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				Corrected in the final: "Complies. A copy of PEFC requirement. The general requirement is recommended to be adapted to the context of Russian forest management.
55.	Appendix IV / 91	Requirement 13: Complies. Compliance to accreditation standards annual surveillance audits.	The standard requires the period for surveillance audits does not exceed more than one year! The statement "annual audit" therefore is not satisfactory as it can exceed one year.	Corrected in the final as aligned with the PEFC Russia documentation: "Complies. I-Surveillance audits are to be carried out at least once a year".
56.	Appendix VI / 99	Requirement 3: The currency shall be updated	Recommendation to classify this as an observation.	Relates to copying of the text from PEFC Council documentation. Addressed as described in question 15 on copying
57.	Report 6.1.5 p. 20	Standard setting rules (document 2) public standard setting procedures, formal approval of the standard within the System and publication of issued standards	The verb is missing in the sentence.	Corrected: "Standard setting rules (document 2) set public standard setting procedures and require a formal approval of the standard within the System and publication of issued standards. System description and working group regulations have supportive requirements".
58.	1.4/3	Chapter 3 give a summary of findings covering all elements of PEFC conformity assessment.	Should read: Chapter 3 gives a summary	The grammatical and spelling mistakes made by consultant are corrected as recommended. Corrected: "Chapter 3 gives a summary"
59.	3.4 / 6	The System has options for certification of a group of forest mangers on any	Should read: of a group of forest managers	Corrected: " The System has options for certification of a group of forest

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		geographic area The System requirements for group certification complies with PEFC requirements in territorial certification.	comply with PEFC	managers on any geographic area. The System requirements for group certification comply with PEFC requirements in territorial certification".
60.	3.6 / 6	Logo use rules complies with PEFC requirements.	Should read: rules comply with	Corrected: "Logo use rules comply with PEFC requirements".
61.	5.1 / 12	PEFC Russia the PEFC governing body for the FCR System (Figure 5.1).	Should read (?): PEFC Russia is the PEFC governing body for the FCR System (Figure 5.1).	Corrected: "PEFC Russia is the PEFC governing body for the FCR System (Figure 5.1)."
62.	5.2 / 12	In August 2015 the notification requirements for chain of custody certification in (ND 002) were updated 	Should read: In August 2015 the notification requirements for chain of custody certification (ND 002) were updated	Corrected: "In August 2015 the notification requirements for chain of custody certification in (ND 002) were updated to require that accreditation bodies shall be signatories to MLA".
63.	6.1.1 / 14	Stakeholders were not actively invited to comment standard setting rules (valid at that time) and the planned process resulting that no procedural comments on were received.	The content is unclear due to the structure of this sentence.	Corrected: "Stakeholders were not actively invited to comment on standard setting rules (valid at that time) and the result of the planned process was so that no procedural comments on -were received"
64.	6.1.3 / 19	Standard setting rules. a copy of PEFC requirements, require	Should read: Standard setting rules. a copy of PEFC requirements, require	Corrected: "Standard setting rules. a copy of PEFC requirements, which require a public consultation for 60 days"

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65.	6.2 / 21	Group organisation, entity and applicants are well defined and participation and participation to group certification	Should read (?): Group organisation, entity and applicants are well defined and participation to group certification	Corrected: "Group organisation, entity and applicants are well defined and participation in group certification…"
66.	6.2 / 22	Functions and responsibilities of a group entity: Bullets 1 – 5	The answers given are hard to follow due to unlogical brackets. Please check.	Corrected: "System regulation (document 1) provisions for functions and responsibilities of the group entity are copied from the PEFC standard for joint certification.
				In joint group certification the group entity shall have written procedures for group management c) and a commitment from each member to respect standard requirements (a-b). Lesnichestvos represent group organisation (a) and according to the PEFC Russia System Regulations (2015) they "have the same functions and obligations as they would have under joint certification".
				Both joint and territorial group certification require written agreement with participants (see Membership commitment (document 5) for the text), an attestation on participation to group certification (e-f) and provision of adequate guidance (g).
				Group entity shall operate annual internal monitoring programme on

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				participants (h-i) "
67.	6.3.2 / 24	PEFC C2: FCR standard require systematic monitoring of health risks and to make measure to minimize the risk. It also address the restrictions on chemical use.	Should read: FCR standard requires systematic monitoring of health risks and to make measures to minimize the risk. It also addresses the restrictions on chemical use.	Corrected: "FCR standard requires systematic monitoring of health risks and taking measures to minimize the risk. It also address the restrictions on chemical use.
68.	p. 25	ILO-Conventions: what about the others (W.A., CBD etc.)?		The ratification status and System requirements on the compliance with other relevant international conventions have been added to the report (p.25) Stockholm convention on persistent organic pollutants was ratified by Russia on 17/08/2011 Convention on Biological diversity was ratified on 05/04/1995
69.	p. 26	a combination of environmental + economic chamber is not acceptable for ENGOSs		PEFC Council does not require that standard setting working group has different chambers by interest categories. The different interests shall be presented in the working group



Indufor Oy

Töölönkatu 11 A FI-00100 Helsinki FINLAND Tel. +358 9 684 0110 Fax +358 9 135 2552 indufor@indufor.fi www.indufor.fi

Indufor Asia Pacific Ltd

7th Floor, 55 Shortland St PO Box 105 039 Auckland City 1143 NEW ZEALAND Tel. +64 9 281 4750 Fax +64 9 281 4789 www.indufor-ap.com

Indufor Asia Pacific (Australia) Pty Ltd

PO Box 425 Flinders Lane, Melbourne VIC 8009 AUSTRALIA Tel. + 61 417 381 609 www.indufor-ap.com

Indufor North America LLC

PO Box 28085 Washington, DC 200038 USA 1875 Connecticut Avenue Northwest Washington, DC 200009 USA www.indufor-na.com

