

# Conformity assessment of the “PEFC Italy Scheme for Sustainable Forest Management and Sustainable Plantation Management” against PEFC Council Requirements

Final Report

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## Preface

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The Program for the Endorsement of Forest Certification Scheme Council (PEFCC) engaged ITS Global on 21 July 2016 to evaluate and assess the PEFC Italy Scheme for Sustainable Forest Management and Sustainable Plantation Management against the requirements of PEFC Council. The conformity assessment will inform the PEFCC's decision to re-endorse PEFC Italy under PEFC's system of mutual recognition.

The consultants have undertaken a preliminary conformity assessment, and produced a draft report consistent with PEFCC's guidelines, outlined in PEFCC Informative Guidance Document - *The Assessment Report* (PEFC IGD 1007:03:201X, contained in PEFC GD 1007:2002 of 2012/10/5).

The following Final Draft Report details the preliminary findings from the consultant's assessment, identifying areas of conformity and non-conformity with PEFCC requirements. Where the consultants found areas of non-conformity during the drafting process, they requested that the PEFC Italy provide further clarification in order to inform the Final Draft Conformity Assessment report.

A Final Report will incorporate comments received from PEFC and PEFC Italy following their review of this draft report and a panel of experts review, as well as responses from a stakeholder survey, and the PEFCC minimum requirements checklist.

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## Acronyms

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AALSEA	Associazione Arboricoltura da Legno Sostenibile per l'Economia e l'Ambiente
AB	Accreditation Body
API	Associazione PEFC Italy
BMP	Best Management Practices
CB	Certification Body
CoC	Chain of Custody
ENGO	Environmental Non-Government Organization
FAO	Food and Agricultural Organization of the United Nations
FWG	Forest Working Group
GL	Operational Guidelines
GR	Group Association
I	Indicator
IAF	International Accreditation Forum
ILO	International Labor Organization
ISO	International organization for Standardization
NGO	Non-Government Organization
PEFC	Program for the Endorsement of Forest Certification
PEFCC	Program for the Endorsement of Forest Certification Council
PEFCI	PEFC Italy
PEOLG	Pan European Operational Level Guidelines
PIS	PEFC Italy Certification System
SD	System Documentation
SFM	Sustainable Forest Management
SPM	Sustainable Plantation Management
TA	Territorial Association
UN	United Nations
UNDRIP	United Nations Declaration on the Rights of Indigenous People
WHO	World Health Organization

## Executive Summary

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### Recommendation to PEFC Council Board of Directors

The PEFC Italy Scheme (PIS), as submitted to PEFC by Assoziane PEFC Italy (API) in 2016, has been assessed. The consultant recommends that the Council Board of Directors re-endorse the scheme.

### Summary of Findings

The consultant's recommendation to PEFC Council Board of Directors to re-endorse the PIS is based on following findings:

1. The standard setting process initiated by API (the Standardising Body) is in conformity to PEFC's requirements. Minor non-conformities identified during the drafting of the report were resolved during the period of consultation. These included:
  - a) Role and responsibilities of the Standardising Body;
  - b) Standard setting process;
  - c) Revision of standards and normative documents.
2. The forest management standard conforms to PEFC's *Sustainable Forest Management – Requirements* (PEFC ST 1003: 2010).
3. The group certification models used by PIS to certify eligible forests including:
  - a) General requirements;
  - b) Function and responsibilities for group entities;
  - c) Functions and responsibilities of forest owners (participants)
 conform to PEFC's requirements, as stipulated in *Group Forest Management Certification - requirements* (PEFC ST 1002: 2010).
4. PEFC Italy has adopted PEFC ST 2002:2013 *Chain of Custody of Forest Based Products – Requirements* and translated into Italian, therefore conforming with the requirements.
5. The certification and accreditation procedures required by PIS conform with PEFC's Forest Management Certification Body requirements as detailed in Requirements for Certification Bodies (CBs) conducting PEFC FM certification as defined in *PEFC Technical Document Annex 6 - Certification and Accreditation Procedures*, including requirements that:
  - a) They meet the competence criteria for accrediting certifying bodies;
  - b) Certification bodies are required to use competent and qualified auditors;
  - c) Accredited certification bodies comply with PIS certification procedures.

The consultants originally identified areas of minor non-conformity in its draft report. These related to:

- The identification of disadvantaged stakeholders;
- The processes for establishing opposition to a final draft;
- Inventory and mapping of forest resources;
- Non-organic waste collection;
- Road drainage.

In the case of the first two (process requirements) additional documentation and clarification was provided. With regards to the latter three, appropriate legislative and regulatory requirements were identified by PEFC Italy.

# 1. Introduction - Scope of Report

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The Associazione PEFC Italia (API) has submitted an application to Program for the Endorsement of Forest Certification Council (PEFCC) for re-endorsement of the PEFC Italy Scheme (PIS).

In August 2016, the PEFCC appointed ITS Global to undertake an independent conformity assessment of the PIS against PEFC requirements, in order to inform PEFC's decision whether to re-endorse the PIS.

## 1.1 Scope of Assessment

The assessment methodology employed for the conformity assessment of the PIS is consistent with *PEFC Standard and Systems Requirements Checklist* (PEFC IGD 1007-01: 2012) and related PEFCC standards, guides and informative documents.

The Draft Conformity Assessment Report assesses the conformity of PIS against PEFCC requirements for the following components of the PIS certification scheme:

- Standard Setting Process (Chapter 3);
- Sustainable Forest Management Standard (Chapter 4);
- Group Certification (Chapter 5);
- Chain of Custody Standard (Chapter 6);
- Certification and Accreditation Procedures (Chapter 7);

The PEFC Panel of Experts offered comments on the draft report, to inform ITS Global's Final Conformity Assessment Report.

The Panel of Experts review identified several shortcomings that ITS Global has rectified. The Final Report includes:

- Responses to stakeholder survey distributed by ITS Global (Appendix 2)
- PEFC Standard and Systems Requirements Checklist (Appendix 3);
- Response to Review of Panel of Experts (Appendix 4).

## 1.2 Assessment Process and Methodology for Report

The consultants have used a benchmark approach, where assessments are based on comparing PEFCC's requirements (the Checklist) against the documentation presented by API (detailed below). The consultant's assessment is based on evidence submitted by API to PEFC, and desk research. In keeping with PEFC's requirements for independent evaluation of national schemes. A field visit for the revised PIS was not undertaken by the consultants

As required by the PEFCC, the following conformance ratings were applied in assessing the conformity of PIS with requirements of PEFCC:

**Major non-conformity:** A major non-conformity violates the integrity of the certification system and has to be corrected before the endorsement of the system.

Minor non-conformity: A minor non-conformity does not violate the integrity of the certification system, 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.

Conformity: A procedure described by the system documentation fully meets the particular requirement of PEFC Council.

## 2. Forest certification in Italy and the Structure of PIS

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### 2.1 Forest certification in Italy

Italy's forests cover approximately 9.3 million ha, representing around 31 per cent of the country's total land area.<sup>1</sup> Approximately 1 per cent of the forests are primary forests. The bulk (92 per cent) have been naturally regenerated; 7 per cent is plantation forests. Growing stock are dominated by Beech, Norway spruce and Chestnut.

Around two-thirds of forests are owned privately; the bulk of these are held by individuals rather than companies, with an average size of 3 ha. Public ownership makes up the remaining one-third of forest ownership. Forests and woodlands are generally fragmented in Italy. Around 17 per cent of forests are subject to a management plan.

More than 80 per cent of forests are available for harvesting. However, fragmentation, combined with a lack of management and poor transport infrastructure has resulted in a relatively small Italian forest industry with high costs. Italy's paper and furniture industries for the most part rely on imported materials.

Italian forest policy has been decentralized, with many regulatory functions devolved to the regional and provincial level. Regional governments are largely responsible for forest management, via their agricultural or environmental departments and offices and develop their own laws and regulations in relation to forest management.

Many of these aspects of Italian forestry are reflected in different aspects of certification in the country, such as Territorial Association certification, as well as the wide range of products produced in Italy that can qualify for PEFC Italy certification.

PEFC Italy joined PEFC in 2001. Its first endorsement for the sustainable forest management standard was in 2004. The sustainable plantation management (poplar) standard was first endorsed in 2007, with a subsequent re-endorsement of both standards in 2010.

There are approximately 820,000ha of PEFC-certified forest in Italy. Roughly 3,000 ha are certified poplar plantations. The majority of these forests are in the north-east of the country (Friuli Venezia Giulia, Trentino Alto Adige, and Veneto regions).

### 2.2 Plantations in Italy

Forest plantations in Italy make up a small percentage of total forests and forest enterprises. Like the large number of privately owned forests, plantations are small (around 7.5 ha) and are often part of mixed farming enterprises that comprise agricultural, pastoral and silvicultural systems.

It is important to note that in Italy forest plantations are present only on agricultural land. This is the product of laws and regulations dating back to 1985. The 'Galasso Law'<sup>2</sup> extended a law for the protection of monuments and landscapes to all forest land. Ambiguity around the law severely curtailed silvicultural

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<sup>1</sup> Food and Agriculture Organization of the United Nations (2015). Forest Resources Assessment 2015. FAO, Rome, Italy.

<sup>2</sup> Legge 8 agosto 1985, n. 431 (Galasso), Conversione in legge con modificazioni del decreto legge 27 giugno 1985, n. 312 concernente disposizioni urgenti per la tutela delle zone di particolare interesse ambientale (Gazzetta Ufficiale della Repubblica Italiana n.197 del 22 agosto 1985)

and plantation practices on forest land and prevented the establishment of any new plantations. The net effect is that plantations exist only on agricultural land and are effectively only permitted on agricultural land. It has been observed that the plantations established in Italy in the 1990s on agricultural land were done so as a result of European Community regulation 2080/92 ‘Instituting a Community aid scheme for forestry measures in agriculture’.<sup>3</sup>

As will be stated elsewhere in this report, for these reasons, several requirements are not applicable to the plantation management standard. The ambiguous status of agroforestry systems has been recognized by PEFC via the establishment of a ‘Trees Outside the Forest’ Working Group within the context of the revision of the PEFC SFM standard.

### 2.3 The PEFC Sustainable Forest Management Standard

The PIS is structured to provide certification of eligible natural forest lands and plantations forests under individual and group certification.

Eligible forest owners have three options for obtaining certification to PIS, namely

- Group certification via a group organisation (GR), or
- Group certification via a Territorial Group Association (TA) that is recognised by PEFC;
- Individual certification as a single owner or manager.

A TA is an organisation that is recognised by PEFC Italy that is created by forest owners and managers; it must represent 50 per cent or more of forests in a particular region, and there may be only one TA per region.

Although a TA and a GR are defined differently in the Scheme Documentation, the requirements for both as Applicants are essentially the same: Both TAs and GRs are required to represent group participants in the certification process; their implementation and respect for the standards are the same. The minor difference is that TAs can, if they choose to do so, independently develop a territorial standard; if they choose to do so they are required to follow the same procedures as they would at national level, and the standards must be more restrictive than at national level. The duties of the participants in both GRs and TAs are the same.

### 2.4 Documentation

The API submitted documentation (referenced as Annex 1 – 13 in its Application and in this document) to support their application for re-endorsement and on-going mutual recognition of PIS by PEFC.

Annex 1: ITA 1000	Description of PEFC Italy’s Scheme – Certification of Sustainable Forest Management
Annex 2: ITA 1001-1	Criteria and indicators for sustainable forest management certification on an individual and group scale
Annex 3: ITA 1001-2	Complementary criteria and indicators for sustainable forest management on a territorial group level
Annex 4: ITA 1004	Description of PEFC Italy Certification Scheme of Sustainable Tree Plantation Management
Annex 5: ITA 1004-1	Criteria and Indicators for Individual and Group Certification of Sustainable Tree Plantation Management

<sup>3</sup> Colletti L. (2001). Risultati dell’applicazione del regolamento CEE 2080/92 in Italia. Sherwood – Foreste ed Alberi Oggi 70, 23–31

Annex 6: ITA 1003-1	SFM and SPM Accreditation Minimum requirements
Annex 7:	Statutes of PEFC Italia
Annex 8:	Description of forest and wood sector in Italy
Annex 9:	Presentation of the Proceedings of the FORUM on Criteria Identification for Sustainable Forest Management (SFM) and Sustainable tree Plantation Management (SPM) at the National level
Annex 10: ITA 1002:	Certification Scheme of Chain of Custody
Annex 11	PEFC Italia Notification documentation
Annex 12	Process Documentation
Annex 13	System check lists

It is also relevant to note that API's documentation for PIS also refers to other documentation which for purpose of the assessment are considered as reference documents. Examples include references to PEFC Standards and Guides, and ISO documents and Italian legislation. Italian legislation referred to in this document is listed below, with a short description of the legislation and its relevance to the scheme.

'Forest Law 3267/1923' – is Italy's basic forest law. The law places stringent hydro-geological restrictions on all forest areas in order to protect soil from erosion and damage, prohibiting soil working and conversion without provincial authorities. Unplanned removals and clearings are prohibited under the law with the exception of those on low-land plains.

'Galasso Law 431/1985' (Legge 8 agosto 1985, n. 431 (Legge Galasso), (Gazzetta Ufficiale della Repubblica Italiana n.197 del 22 agosto 1985)) – extended the prohibitions of the Forest Law and introduced compulsory national protection for the landscape, including both forested areas and wood lands, as well as sites of historical and cultural significance. The law prohibits the conversion of forested land to other uses and by default only permits the establishment of plantations on existing agricultural land that cannot be considered 'forest'.

'Forest Law 227/2001' updates the definitions in 3267/1923 and differentiates more clearly between forested land and agricultural land. It strengthens the prohibitions on clearing of forest areas.

### 2.3 Abbreviations used in this document

Scheme documentation is referred to by its respective Annex number and document number. Specific parts of each document are referred to by Chapter and section number, or in the cases of Guidelines (GLs) and Indicators (I) by their respective Guideline or Indicator numbers. Each assessment also refers to the Appendix 3 of this document, which reproduces the relevant text or sections of text referred to. This is denoted by both Checklist item number and page number.

## 3. Assessment of Standard Setting Processes

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### 3.1 Introduction

The following chapter assesses the standard setting procedures and process for the API against PEFC Standard Setting – Requirements (PEFC ST 1001: 2010). For each requirement stipulated in the standard, the consultants have assessed the API evidence, together with reference to the relevant Scheme Documentation and conformity judgement.

### 3.2 Assessment Results

#### 3.2.1 Standardising Body<sup>4</sup>

##### **Requirement 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 (see 4.4) and for formal adoption of the standard (see 5.11),
- b) the record-keeping procedures,
- c) the procedures for balanced representation of stakeholders,
- d) the standard-setting process,
- e) the mechanism for reaching consensus, and
- f) revision of standards/normative documents

##### **Evidence:**

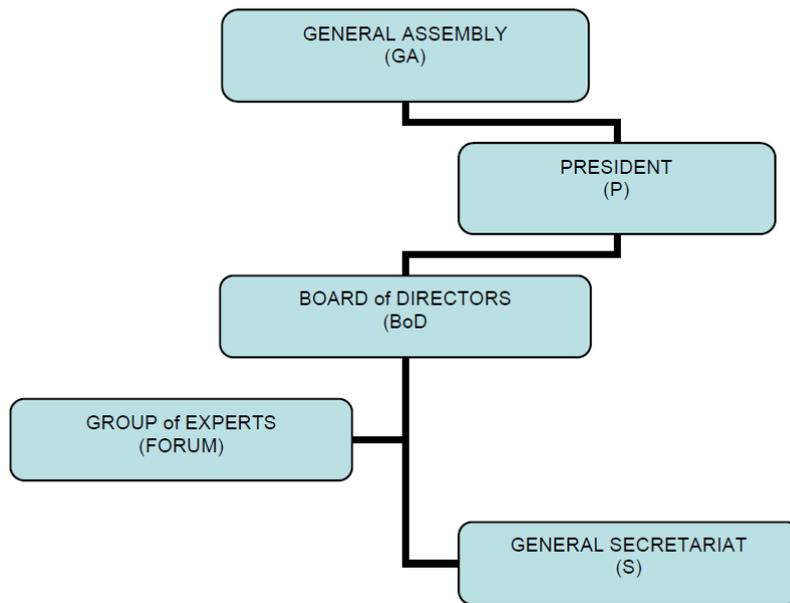
Procedures: The Assocaizone PEFC Italia (API) has written procedures for standard setting (as documented Standard Revision Setting Process and Working Group Rules (Annex 1, Appendix 1)). The Procedures, approved by the PEFC Forum Working Group in January 2015 and amended in October 2015, detail:

- (i) The status of API (Standardising body) as the owner of PEFC Italy with sole responsibility for approving and formal adoption of API's PEFC Italia Certification System (PIS). API formally adopted the Standard at meeting on October 28, 2015 (Annex 1 Appendix 1 A1);
- (ii) The rules for convening the Forum Working Group (FWG) to recommend the Standard to PEFC Italia based on consensus with FWG (Annex 1 Appendix 1 B4);
- (iii) The maintenance by API of records and documentation in relation to standard setting activities for 5 to 7 years (Annex 1 Appendix 1 B5);
- (iv) The membership of FWG to include a balance of "appropriate interests with no single interest representation can dominate decision making procedures". The Procedure lists the variety of organisations intended to be represented on FWG (Annex 1 Appendix 1 B1);
- (v) The processes the FWG will implement to deliver the standard setting process (Annex 1 Appendix 1 C1 – C3);
- (vi) The mechanisms for demonstrating that FWG reached consensus (Annex 1 Appendix 1 C2); and The Procedure requires API to convene an FWG to "correct and revise Italian SFM standards within five years of its approval" (Annex 1 Appendix 1 B1).

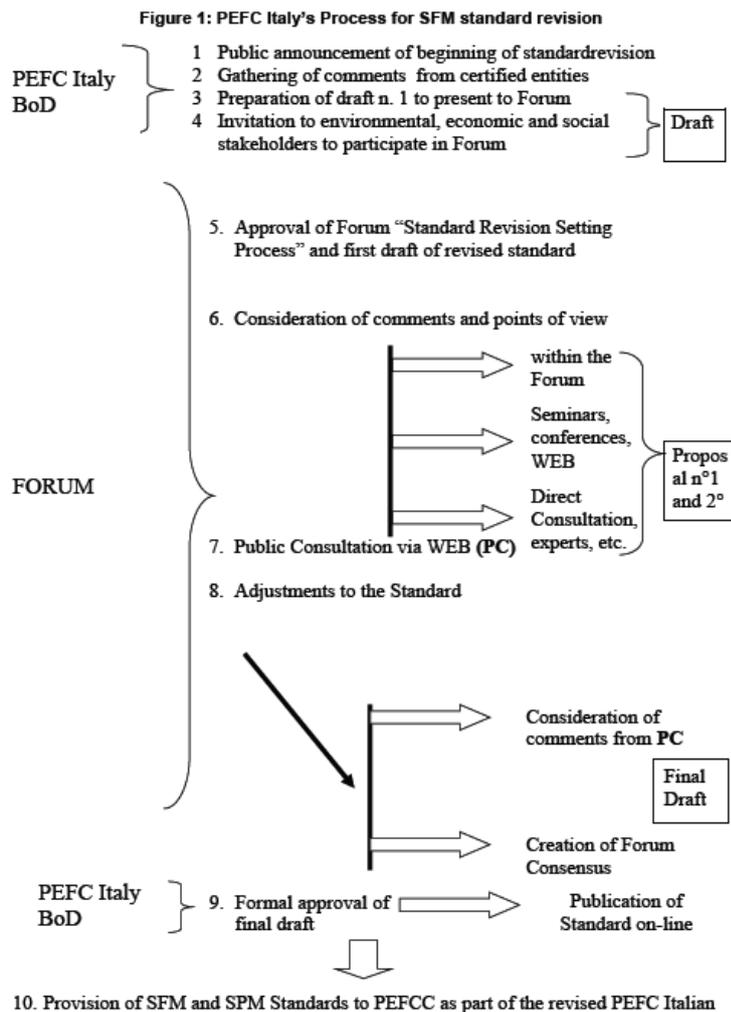
The structure is summarised visually in the scheme documentation as:

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<sup>4</sup> Requirement 4.1 - 4.6 in *Standard Setting – Requirements* (PEFC ST 1001:2010) and *PART I: Standard and System Requirement Checklist for standard setting*



The revision process is described in the scheme documentation below:



Page reference in Appendix 3: pp.74-80

**Consultant's Assessment:** *Conforms*

**Requirement 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.

**Evidence:**

Procedures: At principle level API's practice is to periodically review and update its standard setting procedures as required, and convene a FWG to "correct and revise Italian SFM standards within five years of its approval" (Annex 1). Specifically API's Standard Setting Procedure requires the convening of FWG at a time not exceeding a five year period from the field implementation of last standard revision (Annex 1 Appendix 1 B1).

Process: The API (the standardizing body) made the standard-setting procedures for PICS (Annex 1) publicly available on its Website (Annex 12.1) and via other appropriate websites (Eco Delle Foreste -- <http://www.ecodelleforeste.it/revisione-standard-certificazione-forestale-pefc-italia-incontro-forum/>) through both an announcement and a direct link to the procedures. Evidence that comments from stakeholders have been considered appears in the form of Forum minutes for the Standard revision (Annex 12.5), correspondence with Forum members (Annex 12.3) and notated changes to working drafts (Annex 12.4).

Page reference in Appendix 3: p.80

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

**Evidence:**

Procedures: In principle, "The records are kept for a minimum of five years and shall be available to interested parties upon request." (Annex 1, 6.1.3) Specifically, the API requires the FWG to keep records of the standard development (Annex 1 Appendix 1 B5) and that these records are provided to API and must be maintained for seven years.

Process: Evidence for compliance is present in the form of form of Forum minutes for the Standard revision (Annex 12.5), correspondence with Forum members (Annex 12.3) and notated changes to working drafts (Annex 12.4) that have been utilized throughout the process.

Page reference in Appendix 3: p.81

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

**Evidence:**

Procedures: The API established the FWG to review the Standard (Annex 1 Appendix 1 B1). The FWG is required to:

- a) Be accessible to stakeholders (Annex 1 Appendix 1 B1);
- b) Have balanced representation and decision making of appropriate interests relevant to the subject matter and geographical scope of the standard (stakeholder categories -- Forest owners and Consortium, Regional and National government, Trade Unions, Wood processing industry, Environmental organizations, Forestry practitioners and forest workers, Forest consultants organizations, Wood products art craft, Consumers, mixed category (Research organizations, Academy, Standardizing body etc.) Annex 1 Appendix 1 B1) and that “no single category of the interest representation can dominate decision making procedures” of AWG (Annex 1 6.1.4);
- c) Include, but not be limited to, interest categories representing Forest owners and Consortium, Regional and National government, Trade Unions, Wood processing industry, Environmental organizations, Forestry practitioners and forest workers, Forest consultants organizations, Wood products art craft, Consumers, mixed category (Research organizations, Academy, Standardizing body etc.) Annex 1 Appendix 1 B1). These interest categories have expertise relevant to forest management standards for PEFC Italy, and are materially affected by Standard and influence implementation of Standard.

Process: Evidence that the requirements have been met have been provided in the form of:

- a) Accessibility: PEFC Italy requested the assistance of a forest owners’ consortium (Federforeste) to organize the Forum, and identify and contact materially and directly affected stakeholders via both email and telephone. This process took place between May and November of 2014. Invitation letters have been provided in Annex 12.2 as evidence to support this.
- b) Balanced representation: PEFC Italy has provided a list of Forum members in Annex 9 of its documentation. The membership comprises regional public forest representatives (5), private forest owner consortia (5), civil society (3), consultants (3), environmental groups (3), practitioners /workers (3), processors (2), trade unions (2), research organisations (2), multilateral organisations (1), and PEFC Italy.
- c) Relevance: The organisations that are represented are legitimate organisations that for example promote SFM and CoC implementation (i.e. Legnoservizi), a cooperative for agroforestry (Consorzio Lavori Agro Forestale) and a national farmers’ organisation (Coldiretti).

The documentation presented by API to support re-endorsement of PICS demonstrates that the above requirements were met in practice.

Page reference in Appendix 3: p.83

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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. Upon receipt of the complaint, the standard-setting body shall:

- a) acknowledge receipt of the complaint to the complainant,
- 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
- c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.

**Evidence:** The API's procedures for the investigation and resolution of complaints and appeals are detailed in API's 'Complaints and Dispute Resolution Procedures' (A1 6.1.5). The Procedures cover decisions and/or activities by the Panel of Experts for Conflict Resolution (Appendix 1 C3). API's Procedures require:

- a) API to acknowledge receipt of the complaint in writing to the complainant (6.1.5 (a));
- b) API to take action to validate the complaint, instigate investigation in impartial and objective manner (6.1.5 (b)). API is required to make a decision on the complaint based on the report of the Panel of Experts for Conflict Resolution (Appendix 1 C3 and 6.1.5 (b));
- c) API is to inform the complainant about the outcome of the complaint 'formally' and sent through registered mail (6.1.5 (c)).

Assessor's notes: The material presented in the Appendix does not clearly specify the relationship between API and the Panel of Experts; clarification of the relationship and the procedures would be helpful.

Page reference in Appendix 3: p.85

**Consultant's Assessment:** *Conforms*

#### **Requirement PEFC ST 1001: 2010 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.

**Evidence:** All communications, including complaints and appeals are to be addressed in writing to the API Secretary General (Annex 1: 5).

Page reference in Appendix 3: p.86

**Consultant's Assessment:** *Conforms*

### **3.2.2 Standard-setting process<sup>5</sup>**

#### **Requirement PEFC ST 1001: 2010 5.1**

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

**Evidence:**

Procedures: API (the standardizing body) is required to establish the FWG, which is a "permanent Working Group of external experts (that is a balanced representation of stakeholder categories relevant to forest

<sup>5</sup> Requirements 5.1 - 5.12 in *Standard Setting – Requirements* (PEFC ST 1001:2010) and *PART I: Standard and System Requirement Checklist for standard setting* (PEFC ST 1001:2010)

sector) ... to periodically (at least every five years) review the national SFM Standard, according to formal procedures for standard setting activities recognized by PEFC.” (Annex 1 2.2.2.4)

Process: The FWG’s constitution represents such a cross section of stakeholders. In its application API has provided evidence that invitations were distributed to a representative cross section of stakeholders. The membership comprises: provincial administrations, private and public forest consortia, private forest owners, regional administrations, peak industry bodies for processing, environmental groups, forest workers, forest consultants, consumer/civil society groups, research groups and the standardizing body. A list is provided below, which has been drawn from Annex 1 and Annex 9.

Constituency and maximum number of appointments to Steering Group	Constituency Members	Name Organizations	Name
Woodland owners and Consortium	Public Administration	Provincia Autonoma Trento	Francesco Dellagiacoma
	Public Administration	Provincia Autonoma Bolzano	Marco Pietrogiovanna
	Private and Public Forest Consortia	Federforeste	Pietro Torchio
		Confagricoltura	Concezio Gasbarro
	Private and Public Forest Consortia	Consorzio Amiata	Francesca Galli
	Private forest owners Organization	Aziende Agricole diocesane riunite Srl	Leonardo Nocentini
	Poplar growing	Asprolegno*	Fabio Fracchia
	Regional Administration (Ordinary)	Regione Veneto	Giovanni Carraro e Isabella Pasutto
	Regional Administration (Ordinary)	Regione Emilia Romagna	Enzo Valbonesi
	Regional Administration (Special)	Regione Friuli Venezia Giulia*	Maria Cristina D’Orlando
Wood processing industry	Private Organizations	Federlegno-Arredo	Claudio Garrone
		Conlegno	Maria Rita Gallozzi
Environmental organisations	National organization	Legambiente	Federica Barbera
	National organization	Amici della Terra	Monica Tommasi
	National organization	FareAmbiente	Massimo Scarpetta
Forestry practitioners and forest workers (S)	National organization	Colafor	Gasper Rino Talucci
	National organization	Conaibo	Livio Bozzolo e Giulio Zanetti
	Regional organization	Legnoservizi	Daniele Peresson
Forest consultants organisations	Public organization	CONAF	Mattia Busti
	Private organization	Geoponica*	Alessandro Pansecco/Carlotta De Zio
	Private organization	Consorzio regionale forestale FORESTARE	Benito Scazziota
Consumers and civil society	National Consumer Organization	Aalsea*	Paolo Mori

	Associazione culturale tecnica	AIAF (Associazione italiana agroforestazione)*	Michele Salviato
	Associazione zona rurale e Montana	ForestAmica	Claudio Cervellati
Other	Ente Normatore	PEFC Italia*	Antonio Brunori/ Eleonora Mariano
	Accademia e Università	Accademia di Scienze Forestali	Davide Travaglini
	CNR	IVALSA Sesto Fiorentino	Carla Nati
	CRA	Unità di Ricerca per le Produzioni Legnose Fuori Foresta*	Lorenzo Vietto e Domenico Coaloa Achille Giorcelli
	Coldiretti	Coldiretti – Sez.pioppo*	Stefano Loporati
	Unprofor	Unprofor	Andrea Montresor

Page reference in Appendix 3: p.86

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

**Evidence:**

Procedures: The API Standard Setting Procedures require that key stakeholders are identified and invited to participate in the FWG: “Are considered disadvantaged stakeholders those that cannot participate because of financial problems, lack of transportation facilities or lack of informatics tools for the exchange of the standard revision documentation, while key stakeholders are those organizations that strongly influence the revision process because of their relevance in the Forest and related sectors.” (Annex 1 Appendix 1 B1)

API is required to “to assure that 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.” (Annex 1 Appendix 1 B1). This is also reiterated at 2.2.2.4, 6.2.2, 6.2.3 and 6.2.6

Process: In practice, the stakeholders have been identified according to their disadvantaged status by the FWG. This is documented in Annex 12.3 and in Annex 9. One group of stakeholders – timber workers – has been denoted as (S) – ‘svantaggiati’ – in the FWG list. Direct and additional Correspondence has been confirmed with the API.

Page reference in Appendix 3: p.86

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

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. 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,
- d) an invitation to comment on the scope and the standard-setting process, and
- e) reference to publicly available standard-setting procedures.

**Evidence:**

Procedures: The PEFC Italy procedures require that it “will 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.”

(Annex 1 2.2.2.4). The Standard Setting Procedures specify that the announcement will contain:

- 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. The invitation to disadvantaged and key stakeholders will be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,
- d) an invitation to comment on the scope and the standard-setting process and
- e) reference to publicly available standard-setting procedures.

Process: The process implemented by FWG for revision of Standards for Sustainability for Forest Certification included:

- July 25 2014 API announced notification of the convening of FWG via its website;
- November 10 2014, FWG and API sent an email to 396 email contacts, announcing the commencement of the process and inviting members. The invitation was to a ‘SkyMeeting’ announced the convening of the FWG
- The announcement contained references to the scope and the standard setting process;
- A 60-day Pre-Revision public consultation was announced on July 2 2015 via the website. The notification announced the objectives and scope of the consultation, and outlined several means by which comments could be submitted (email, fax, and mail).
- The announcement for the revised (draft) *Standards* was distributed via press release and e-newsletter contact lists, as well as through API Website and professional media distribution services. The announcement included information about opportunities for stakeholders to participate in the consultation process (Annex 12.1).

The documentation provides information on opportunities for stakeholders to participate including via a SkyMeeting ‘virtual meeting’ process and information on the objectives, scope and steps in process and timetable.

Page reference in Appendix 3: p.87

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

**Evidence:**

Procedures: The text of the procedures (Annex 1, 6.2.4) duplicate the requirement above.

Process: The API convened the FWG (announced on November 6, 2014 and operating over 2014/2015) to develop and recommend a revised Standard (Annex 12.3).

The FWG reviewed the 175 sets of comments received from consultations with the FWG in this period associated with revision of Standard. The FWG agreed on and finalized a revised Standard at meetings on April 22 2015 and June 28 2015 (Annex 12.5).

Page reference in Appendix 3: p.90

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

**Evidence:**

Procedures: API's Standard Setting Procedures require the FWG to undertake their responsibilities in open and transparent manner and freely exchange information (Annex 1 6.2.5).

Minutes of meetings of FWG (Annex 12.5) support the outcomes of:

- a) members of FWG actively participating in revision processes and having ready access to working drafts; and
- b) members of FWG being provided with opportunities to make meaningful comments in re-drafting processes;
- c) comments by FWG members were considered by other members in open and transparent way and proposed changes in Standard recorded.

Page reference in Appendix 3: p.91

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

### **Evidence**

Procedures: The API documentation meets the procedural requirements as follows:

- a) The API Standard Setting Procedure requires the enquiry Standard, upon consensus of FWG be made available for public review and comment (Annex 1 6.2.6), and the API “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.” (Annex 1 6.2.6).
- b) API Standard Setting Procedures provide for all interested parties which cannot participate in the FWG due to their own or access to API’s financial or staffing resources have opportunity to provide their views and comments through FWG members or through public consultation process (Annex 1 Appendix 1 B1).
- c) API Standard Setting Procedures require the API to make available for public review and comment, upon consensus of FWG, the draft (enquiry) Standard (Annex 1 6.2.6).
- d) API Standard Setting Procedures require for the enquiry draft that “the public consultation is for at least 60 days,” (Annex 1 6.2.6).
- e) API’s Standard Setting Procedures require any presented comments shall be reviewed and considered by FWG in an open and transparent manner (Annex 1 6.2.6).
- f) API’s Standard Setting Procedures require the comments, responses received, and relevant modifications to (enquiry Standard) shall be made available upon request (Annex 6.1.3).

Process: In the context of developing the standard, the process requirements were met as follows:

- a) the API announced the start and end of public consultation period via the PEFC Italy website and other websites on June 4 2015, within one day of the opening of the consultation period; the consultation period was extended beyond its original 60-day period by approximately two weeks (Annex 12.1)
- b) In the context of developing the Standard, system documentation supports a judgment that information reached key stakeholders and was understandable (for example, API’s provision of an easily accessible web form).
- c) The enquiry standard for the consultation was made publicly available on June 4, 2015 via website announcements (PEFC Italy, AALSEA and Federforeste) (Annex 12.1)
- d) In the development of the Standard the public consultation period was June 3 to August 17 2015. This was documented in Annex 9 and evidence has been provided in the form of website announcements which have been cited (Annex 12.1).
- e) The comment(s) received were considered, but it is not entirely clear they were considered in an objective – as opposed to ‘open and transparent’ manner (Annex 12.6). However, that the comments were considered openly would indicate that a range of views from varied stakeholders in an open forum would constitute objectivity.
- f) The minutes of meeting of the FWG incorporating FWG deliberations on issues raised during public consultation process were available on API website in practice (Annex 12.6).

Page reference in Appendix 3: p.92

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1001: 2010 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.

**Evidence:** API's Standard Setting Procedure provides an option for API to pilot test any revisions or modifications to Standard (Annex 1 6.2.7).

No pilot testing was undertaken of the Standard. The consultants acknowledge that the 2015 Standard:

- was subject to two revision processes (a Pre-Revision Public Consultation Period and enquiry draft stakeholder consultation); and
- incorporates the lessons learnt (experiences) from application of the Standard over time.

PEFC note that "pilot testing is not required in case of revision of a standard where experience from its usage can substitute for pilot testing". On this basis the consultants deem the API's judgment not to conduct pilot testing as reasonable, and complying with PEFC requirements.

Page reference in Appendix 3: p.96

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1001: 2010 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.

In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition:

- a) a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,
- b) a telephone conference meeting where there is a verbal yes/no vote,
- c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or
- d) combinations thereof.

**Evidence:** API's Standard Setting Procedures require the FWG to provide evidence to API that they have reached consensus (Annex 1 6.2.8) by utilizing the processes detailed in Annex 1 Appendix 1 C3 before API formally approve Standard.

The FWG for the Standard demonstrates consensus through meeting minutes for revisions (Annex 12.5). Evidence of consensus for the final approval appears in the specific request for final approval, to which no objections were received.

Page reference in Appendix 3: p.97

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1001: 2010 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,
- 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,
- c) dispute resolution process.

**Evidence:** API's Standard Setting Procedures require the FWG in the case of "a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue" to utilize the mechanisms specified by PEFC requirements (Annex 1 6.2.8 (a to d)). In the context of revising the Standard this issue did not arise. FWG is operated by consensus.

Page reference in Appendix 3: p.98

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 5.10**

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

**Evidence:** API's Standard Setting Procedures require documentation on implementation of standard setting processes to be made publicly available (Annex 1 6.2.10).

During the development of Standard the API made publicly available (via website and emails) documentation on implementation of standard setting process (Annex 12.1).

Page reference in Appendix 3: p.99

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 5.11**

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

**Evidence:** API's Standard Setting Procedure requires API to approve the Standard based on evidence that FWG has reached consensus (6.2.11).

The API formally approved the Standard at the Board Meeting on November 9 2015 (Annex 7). There was no opposition to the approval, despite calls for expression of opposition according to established norms; any responses received were positive.

Page reference in Appendix 3: p.100

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 5.12**

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

**Evidence:** API's Standard Setting Procedures require the API to make Standard publicly available (Annex 1 6.2.10).

The 2015 Standard was approved on October 28 2015. It was publicly released on 4<sup>th</sup> November 2015 via Press Release and API's Website on that date; a link has been provided in Annex 12.1.

Page reference in Appendix 3: p.100

**Consultant's Assessment:** *Conforms*

### 3.2.3 Revisions of standards/normative documents<sup>6</sup>

#### **Requirement PEFC ST 1001: 2010 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.

**Evidence:** API's Standard Setting Procedure requires that API Board of Directors will convene a FWG to "correct and revise Italian SFM standards within five years of its approval." (Annex 1 Appendix 1 B1). The procedures for the revision of the standard are consistent with requirements of Chapter 5, *PEFC Standard Setting Requirements*.

Page reference in Appendix 3: p.101

**Consultant's Assessment:** *Conforms*

#### **Requirement PEFC ST 1001: 2010 6.2**

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

**Evidence:** Annex 1 6.3.2 "The revision will define the application date and transition date of the revised standards/normative documents."

Page reference in Appendix 3: p.101

**Consultant's Assessment:** *Conforms*

#### **Requirement PEFC ST 1001: 2010 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.

<sup>6</sup> Requirements 6.1 - 6.4 in *Standard Setting – Requirements* (PEFC ST 1001:2010) and *PART I: Standard and System Requirement Checklist for standard setting* (PEFC ST 1001:2010)

**Evidence:** Annex 1: 6.3.3 The application date will 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.

Page reference in Appendix 3: p.101

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1001: 2010 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.

**Evidence:** Annex 1 2.1: “The period of transition for the implementation of the changes to the scheme will last 12 months from the moment in which the scheme is approved by PEFC Council, for all the new certifications and for renewals” and “6.3.4 The transition date will 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.”

Page reference in Appendix 3: p.101

**Consultant's Assessment:** *Conforms*

### 3.3 Overall Assessment

The standard setting processes documented and implemented by API are assessed as meeting the requirements of PEFC Standard Setting Requirements (PEFC ST 1001: 2010) in relation to:

- (i) API meeting the responsibilities for the Standardising body;
- (ii) Standard setting process;
- (iii) Revision of PIS Standards of Sustainability for Forest Certification.

## 4. Assessment of Forest Certification Standard

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### 4.1 Introduction

*The following chapter assesses the revised PIS standard against PEFC Sustainable Forest Management – Requirements (PEFC ST 1003: 2010). For each requirement stipulated in the standard, the consultants have assessed the PIS' evidence, together with reference to the relevant scheme documentation and conformity judgement.*

The API utilizes:

Annex 2: ITA 1001-1	Criteria and indicators for sustainable forest management certification on an individual and group scale
Annex 3: ITA 1001-2	Complementary criteria and indicators for sustainable forest management on a territorial group level
Annex 5: ITA 1004-1	Criteria and Indicators for Individual and Group Certification of Sustainable Tree Plantation Management

as benchmarks for the performance of forest owners seeking certification under PIS. The Standard is the result of revision conducted by API of the previous Standard in 2014 and 2015.

The Standard for Sustainable Forest Management consists of six Criteria for SFM for Individual and Group Forest Management, with the same six Criteria for Sustainable Forest Management on a Territorial Group Level, and for Sustainable Plantation Management.

The implementation of the forest management Standard is underpinned by Operational Guidelines (GL) for each Criterion, and Indicators (I) to guide the actions specified to successfully meet the performance standard.

The implementation of the plantation management standard is underpinned by guidelines for planning and practice.

The Standard is based on Pan European Operational Level Guidelines (PEOLGs) for sustainable forest management, reflecting the seven Montreal Process criteria and encouraging adaptive management by forest owners.

The SFM standards and SPM standards are assessed concurrently. Where the assessment for plantation management is applicable it is noted in the assessment as SPM. Differing assessments across the different standards are noted where necessary.

### 4.2 Assessment Results

The following conformity assessment against the PEFC requirements uses the following notation to refer to the relevant sections of API's 2015 Standards. The relevant standard is coded by Annex. Operational Guidelines for each criteria are referred to as GL. Indicators are coded as I (for example I 1.1.a refers to Indicator 1.1.a).

#### 4.2.1 General requirements for SFM standards<sup>8</sup>

##### **Requirement PEFC ST 1003: 2010 4.1**

The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall

- a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all SFM requirements is achieved at the forest management unit level.

##### **Evidence:**

The Standard is defined as a National Standard and is applicable to “All types of natural and semi-natural forests and management systems which exist in Italy” (Annex 9 2.1). The scheme documentation also notes that “Plantations were also considered in this document, but in a separate document since Italian legislation (D.lgs 227/2001)<sup>9</sup> considers the forestry sector under different normative rules from tree plantation sector, the latter being connected to agricultural sector.”

The two forest management standards (ITA 1001-1 and ITA 1001-2) include indicators for individual and group level, the document ITA 1001-2 is for indicators at the regional level. Regarding ITA 1001-2, these indicators are complementary.

<u>Standard Reference:</u>	Annex 9 2.1
<u>Reference:</u>	Forest Law 227/2001
<u>Page reference in Appendix 3:</u>	p.113

<b>Consultant's Assessment:</b>	<i>Conforms</i>
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##### **Requirement PEFC ST 1003: 2010 4.1**

- b) be clear, objective-based and auditable

##### **Evidence:**

The PEFC Italy evaluation of sustainable forest management (SFM) “is based on the criteria (C), the indicators (I) and the operative guidelines (GL) developed at the Ministerial conferences in Helsinki and Lisbon, during the so-called “Pan European Process” for the protection of European forests.” The Standard has been structured to reflect this. The requirements for SFM in the Italian standard are presented as six criteria (numbered 1 to 6); these include normative ‘guidelines’ (referred to as GL) and both normative and descriptive indicators. The Standard states that the normative indicators constitute the basis of the verification of the certification criteria. The descriptive indicators “are reported with the aim of improving the information and the communication between the various subjects interested in sustainable forest management”. The indicators contain:

- Measurement parameters: measurable sizes or elements as is verifiable by the CB
- Critical thresholds (for the normative indicators): necessary requirement as is verifiable by the CB
- Areas of improvement: main themes proposed for improving services
- Examples of data sources and information sources: examples of tools to be used to gather information

<sup>8</sup> Requirements 4.1 (a) – (d), in *Sustainable Forest Management – Requirements* (PEFC ST 1003:2010) and *PART III: Standard and System Requirement Checklist for Sustainable Forest Management*

<sup>9</sup> Decreto Legislativo 18 maggio 2001, n. 227 "Orientamento e modernizzazione del settore forestale, a norma dell'articolo 7 della legge 5 marzo 2001, n. 57" pubblicato nella Gazzetta Ufficiale n. 137 del 15 giugno 2001 - Supplemento Ordinario n. 149

The first two indicators (measurement parameters, critical thresholds) are clear, object-based and auditable. The Standard states that the ‘areas for improvement’ are reported with the ‘aim of improving the information and communication’; this requirement is clear, the objective is stated, and the reporting (or consideration) of these areas are auditable.

The requirements for Sustainable Plantation Management in the Standard are organised according to the same PEOLG process, with a structure reflecting the Helsinki Process, with normative guidelines and related indicators, i.e. assessment parameters and thresholds.

Standard References: Annexes 1, 2, 4, 5  
Page reference in Appendix 3: p.113

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 4.1**

- c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.

**Evidence:**

The Standard states that forest owners are “conform to the requirements imposed by the Italian PEFC certification scheme” applying to regions, groups and individuals, as required in (ITA 1000 2.2.1 -- 2.2.1.1.1 e, 2.2.1.2.1 e, 2.2.1.3 f respectively). These regional owners, groups and individuals must ensure that third parties also comply with the criteria for SFM.

The Standard applies to the activities of all forestry operators in the certified area.

Standard References: Annex 1 – 2.2.1 (2.2.1.1.1 e – 2.2.1.2.1 e – 2.2.1.3 f)  
Page reference in Appendix 3: p.113

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 4.1**

- d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.

**Evidence:** The Standard requires the forest operator to have written management plans consistent with the size of the forest and the needs and intensity of forest activities. Operators must keep records and documents to demonstrate conformance with forest certification.

Standard References: Annex 1 3.1  
Page reference in Appendix 3: p.113

**Consultant’s Assessment:** *Conforms*

**4.2.2 Specific requirements for SFM standards<sup>10</sup>**

<sup>10</sup> Requirements 5.1 - 5.7, in *Sustainable Forest Management – Requirements* (PEFC ST 1003:2010) and *PART III: Standard and System Requirement Checklist for Sustainable Forest Management*

## **Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle**

### **Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard requires forest management practices to “safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by favouring techniques that minimise direct or indirect damage to forest, soil or water resources.” Management plans are required to clearly state the landowner’s objectives, desirable forest condition and include management activities aimed at reaching desired forest condition.

Standard References: SFM: Annex 2 | 1.1a; 1.1b; GL 1.1; GL 1.3  
SPM: I 1a planning  
Page reference in Appendix 3: p.113

**Consultant’s Assessment:** *Conforms*

### **Requirement PEFC ST 1003: 2010 5.1.2**

Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.

**Evidence:** The Standard requires management plans to “be based on current legislation as well as existing land use plans, and sufficiently cover the forest resources and the protection of biodiversity. Monitoring of the forest resource and evaluation of its management must be periodically undertaken, with the results being fed back into the planning process.” Management plans must address management objectives, methods for undertaking silvicultural operations, planning, maintaining inventories” and “management practices which have a social value.”

GL 6.6 requires that “Forest management planning must aim to respect the multiple functions of forests to society”; Indicator 6.2a stipulates a “System for the evaluation of the socio-economic functions of interest to the individual organisation and society, in general.”

For plantations, an Improvement Programme requires operators to implement improvements across one indicator within five years.

Standard References: Annex 2: GL 1.3, I 3.1 b, Criterion 6, in particular I 6.2 a and GL 6.6  
Annex 1: 3.2  
Annex 5: 3.2  
Page reference in Appendix 3: p.114

**Consultant’s Assessment:** *Conforms*

### **Requirement PEFC ST 1003: 2010 5.1.3**

Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.

**Evidence:** The Standard requires "Establishing and maintaining of inventory and mapping of forest resources, adequate to local and national conditions." The SPM standard states conformity to "correspondence with topics"; the SFM document does not. However, inventory and mapping as part of management planning in Italy is required by law; the planning must therefore adhere to the specific regulatory requirements.

Standard References: SFM: Annex 2 I 3.1 b  
SPM: Annex 5 1.B planning  
Page reference in Appendix 3: p.115

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard (GL 1.3) is consistent with this requirement.

Standard References: SFM: Annex 2 GL 1.3  
SPM: Annex 5 1.C Planning  
Page reference in Appendix 3: p.115

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.1.5**

Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products.

**Evidence:** The Standard requires forest owners to complete and implement a management plan which includes, amongst other guidelines concerning, a description of resources to be managed, maintaining and increasing health and vitality of forest, wood production capacity and its valuations, management activities connected with the production of non-timber products.

References: SFM Annex 2 I3.1.b  
SPM Annex 5 I3.C Planning  
Page reference in Appendix 3: p.116

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.1.6**

A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is publicly available. The summary may exclude confidential business and personal information and other

information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.

**Evidence:** Applicants are required to make available public summaries of forest management, which includes information about the stands (general description), productive area, protected areas, forest management plans, harvesting rate and “any other useful information.” This applies to all applicants..

References: SFM Annex1l 2.2.1.1 (v), 2.2.1.2 (u), 2.2.1.3 (r)  
SPM Annex 5 2.2.1.1 (o), 2.2.1.2 (p)  
Page reference in Appendix 3: p.116

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.1.7**

Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.

**Evidence:** The Standard (GL 1.3) requires “Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.”

Standard References: SFM Annex 2: GL 1.3  
SPM Annex 5: I 1.C planning  
Page reference in Appendix 3: p.118

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.1.8**

Responsibilities for sustainable forest management shall be clearly defined and assigned.

**Evidence:** The Standard and supporting documents clearly define the responsibilities of legal agents of the Territorial Group Association, legal agent of the Group, and/or the Owner, manager or delegate in relation to sustainable forest management, as well as any third parties.

Standard References: SFM Annex 1: 2.2.1  
SPM Annex 5: 2.2.1.1, 2.2.1.2  
Page reference in Appendix 3: p.118

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.1.9**

Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.

**Evidence:** The Standard is consistent with the requirement; it contains guidelines that repeat the PEFC requirement and assessment parameters and thresholds that address: Area of forests, other woodland and changes in area according to forest and vegetation types, ownership structure, age classes, forest origin.

Standard References: SFM Annex 1: GL 1.1, I 1.1.a, I 1.1.b  
SPM Annex 5: 1A practice, 1B practice

Page reference in Appendix 3: p.119

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.1.10**

Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.

**Evidence:** The Standard is consistent with the requirement; the GL repeats the requirement and establishes measurement parameters and critical thresholds that address variation in the total volume of the wood mass, assessed against planning regimes.

Standard References: SFM Annex 2: GL 1.1, I 1.1.a, I 1.1.b  
SPM Annex 5: 1A practice, 1B practice

Page reference in Appendix 3: p.120

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.1.11**

Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:

- a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and
- b) entails a small proportion of forest type; and
- c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and
- d) makes a contribution to long-term conservation, economic, and social benefits.

**Evidence:** The PEFCI does not provide for conversion of forests to other types of land use. The indicator for forest management 1.1.a states “a reduction in forest cover is not permitted (except for documented cases resulting from management and planning policies or instances when compensation is required according to the law in force.” Italian law only permits the establishment of plantations on agricultural land; the conversion of forest land to any other land use is prohibited.

Standard References: SFM Annex 2: I 1.1.a  
SPM Annex 5: 1C practice, 2B practice

Page reference in Appendix 3: p.120

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard repeats the requirement and establishes a descriptive indicator that indicates areas for improvement in relation to afforestation on abandoned land.

Standard References: SFM: Annex 2: GL 1.2  
SPM: 1C practice  
Page reference in Appendix 3: p.121

**Consultant's Assessment:** *Conforms*

## **Criterion 2: Maintenance of forest ecosystem health and vitality**

### **Requirement PEFC ST 1003: 2010 5.2.1**

Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.

**Evidence:** Forest management planning requirements incorporate a requirement for this to be present in planning guidelines, specifically “Maintaining and increasing of health and vitality of forest and rehabilitating of degraded forest ecosystems, whenever this is possible by silvicultural means and by fighting the degradation causes”

Standard References: SFM: Annex 2: I 3.1.b  
SPM: 2A planning  
Page reference in Appendix 3: p.121

**Consultant's Assessment:** *Conforms*

### **Requirement PEFC ST 1003: 2010 5.2.2**

Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.

**Evidence:** The Standard is consistent with the requirement, requiring monitoring of biotic and abiotic factors as a part of forest management practices.

Standard References: SFM: Annex 2 I 2.1.a  
SPM: Annex 5 2B planning  
Page reference in Appendix 3: p.121

**Consultant's Assessment:** *Conforms*

### **Requirement PEFC ST 1003: 2010 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.

**Evidence:** The SFM indicator addresses “damage caused by: biotic/abiotic agents, insects and diseases, fire, wind and snow, game and grazing” and requires the presence of a system for monitoring. The SPM indicator is consistent with the requirement and repeats the requirement verbatim.

Standard References: SFM: Annex 2: I 2.1a (General)

SPM: Annex 5: 2B planning

Page reference in Appendix 3: p.122

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.2.4**

Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.

**Evidence:** Measurement parameters for the indicator (3.1.b) require references to "minimizing the degradation risk and the damages to the ecosystems." The Areas for Improvement for the Indicator makes reference to supporting forest management planning with accurate and up to date inventories and mapping instruments. The SPM standard is consistent with the requirement.

Standard References: SFM: Annex 2: I 3.1 b

SPM: Annex 5: 2C planning

Page reference in Appendix 3: p.122

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.2.5**

Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.

**Evidence:** The GL for SFM is consistent with the requirement. Measurement parameters for I 3.1.b include using silvicultural techniques in order to maximise the ecosystem resistance against parasitic attacks, meteorological events and fires; protection of forest biodiversity; maintaining of natural habitats for biodiversity. The SPM indicator (2A practice) is consistent with the requirement; the SPM indicator (4A planning) specifies that "Forest management planning should aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level, and where appropriate the landscape level."

Standard References: SFM: Annex 2: GL 2.1, I 3.1.b

SPM: Annex 5: 2A practice, 4A planning

Page reference in Appendix 3: p.122

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The SFM GL 2.2 specifies that "fire prevention methods must be applied" and the indicator (2.2.a) stipulates the "presence of activities aimed at avoiding fires (except for the prescribed fires)."

Standard References: SFM: Annex 2: 4.3; I 4.3.1  
SPM: Annex 5: 2B planning

Page reference in Appendix 3: p.123

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.2.7**

Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied. The spillage of oil during forest management operations or the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.

**Evidence:** The SFM and SPM standards are consistent with the requirement. Neither Standard addresses the requirement for 'non organic waste' collection, disposal and storage. However, both European Union and Italian regulations forbid any non-organic waste disposal altogether.<sup>11 12</sup> The Standard states that "The spillage of oil through forest management operations or the indiscriminate disposal of waste on forest land must be strictly avoided." (GL2.2)

Standard References: SFM Annex 2: GL 2.2  
SPM: 2B practices

Page reference in Appendix 3: p.123

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.2.8**

The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.

**Evidence:** The SFM Standard: requires that managers "use preventive biological measures" (GL 2.1), prohibits "the use of pesticides and herbicides and GMO" (GL 2.3), and prescribes avoidance of pesticides and herbicides (GL 2.4). In practice the Standard also requires "Presence of recording and monitoring systems of the use of pesticides and fertilizers as an assumption to minimize their use" (I 2.2.a). The SPM standard conforms with the requirement.

Standard References: SFM: GL 2.1, GL 2.3, GL 2.4, I 2.2 a  
SPM: 2C practices

Page reference in Appendix 3: p.124

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

<sup>11</sup> European Union Directive 2008/98/CE. <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32008L0098>

<sup>12</sup> Disposizioni di attuazione della direttiva 2008/98/CE del Parlamento europeo e del Consiglio del 19 novembre 2008 relativa ai rifiuti e che abroga alcune direttive. (10G0235) [http://sistri.it/Documenti/Allegati/Decreto\\_Legislativo\\_205\\_del\\_3\\_dicembre\\_2010.pdf](http://sistri.it/Documenti/Allegati/Decreto_Legislativo_205_del_3_dicembre_2010.pdf)

**Evidence:** The Standard explicitly prohibits the use of WHO Type 1A and 1B pesticides ‘in any case’ in natural and semi-natural forests. This explicit prohibition is also repeated in the standard for plantation management.

Standard References: SFM: GL 2.3  
SPM: 2C practices  
Page reference in Appendix 3: p.124

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.2.10**

Pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.

**Evidence:** The Standard specifically excludes the use of pesticides whose derivatives remain biologically active and accumulate in the food chain beyond their intended use and any pesticides banned by international agreement “in any case” in natural and semi-natural forests. The indicators for SPM repeat this prohibition.

Standard References: SFM: GL 2.3  
SPM: 2C practices  
Page reference in Appendix 3: p.124

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.2.11**

The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.

**Evidence:** The prohibition on pesticide use (GL 2.4) in combination with training requirements (GL 6.7 and GL 6.8) effectively meet the requirement. The checklist refers to Italian legislation that has not been provided. Desk research by the consultant indicates that this legislation is Italian Legislative Decree No 150/2012 (Articles 7, 8, 9), which implement European Union Directive No 2009/128/EC, which mandates training for users of pesticides.

Standard References: SFM: Annex 2: GL 2.4  
Reference: SPM: Italian Legislative Decree No 150/2012 (Articles 7, 8, 9), which implement European Union Directive No 2009/128/EC, which mandates training for users of pesticides.  
Page reference in Appendix 3: p.125

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.2.12**

Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.

**Evidence:** The SFM Standard requires ‘recording and monitoring systems of the use of pesticides and fertilisers as an assumption to minimise their use’ and nominated Areas for Improvement as “adoption of chemical products with a low environmental impact and biodegradable or with a reduced permanence in the environment; adoption of guidelines for limited use of chemical products.” The SPM Standard is consistent with the requirement.

Standard References: SFM: Annex 2: I 2.2.a  
SPM: Annex 5: 2C practices  
Page reference in Appendix 3: p.126

**Consultant’s Assessment:** *Conforms*

### **Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)**

#### **Requirement PEFC ST 1003: 2010 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.

**Evidence:** The SFM Standard requires managers to “maintain and improve the forest resources and to encourage a diversified output of goods and services over the long term” (GL 3.2). The Standard also states that “Harvesting levels ... Must not exceed a rate that cannot be sustained in the long term” (GL 3.3). Forest management planning requirements include reference to wood and non-wood products that aim to maintain these products on a sustainable basis (I 3.1 b). The SPM Standard is consistent with the requirement.

Standard References: SFM: Annex 2: GL 3.2, GL 3.3, I 3.1 b  
SPM: Annex 5: 3A planning  
Page reference in Appendix 3: p.126

**Consultant’s Assessment:** *Conforms*

#### **Requirement PEFC ST 1003: 2010 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.

**Evidence:** The SFM Standard stipulates that Areas for Improvement in relation to Quantity of Forest Products that production should not decrease over time and that information on services and goods should be enhanced, using data source examples specific research and local studies (I 3.2 a). It also requires planning "must aim to respect the multiple functions of forests to society, have due regard to the role of forestry in rural development and in particular consider the new opportunities for employment in connection with the forest's socio economic functions and with their active sustainable management (GL 6.1). Measurement parameters for a complementary SFM indicator (ITA 1001-2 3.1 c) specify a regulatory framework that assists management planning with the aim to maintain or increase a sustainable output of goods and services. The SPM Standard is consistent with the requirement.

Standard References: SFM: Annex 2: I 3.2 a, GL 6.1; Annex 3: 3.1 c  
SPM: Annex 5: 3B planning

Page reference in Appendix 3: p.127

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.3.3**

Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.

**Evidence:** SFM Indicators specify grazing rights, non-timber products, recreational services (I 3.1.a); " a regional set of rules in force or those undergoing revision" (ITA 1001-2 3.1 a); and "regulatory frameworks and financial instruments with the aim to inform planning that will contribute to non-forest products, recreation" (ITA 1001-2 3.1 c).

Standard References: Annex 2: GL 3.1, Annex 3: 3.1 a, 3.1 c  
Annex 5: 3C planning

Page reference in Appendix 3: p.127

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.3.4**

Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.

**Evidence:** The Standard is consistent with the requirement.

Standard References: SFM: Annex 2: GL 3.2  
SPM: Annex 5: 3A practices

Page reference in Appendix 3: p.127

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.3.5**

Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.

**Evidence:** The Standard requires that harvesting (wood and non-wood) not exceed a rate that cannot be sustained, defining reference period for verification of sustainability (10 years). It also requires the forest management practices address harvesting levels by establishing a sustainable baseline in accordance with long-term forest management planning, and specifying that benefits should not decrease, and that yield is measured.

Standard References: SFM: Annex 2: GL 3.4, I 1.1 b, I 3.1 b, I 3.2 a, I 3.3 a  
SPM: Annex 5: 3B practices

Page reference in Appendix 3: p.128

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.3.6**

Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.

**Evidence:** The Standard requires forest managers to: establish a baseline for sustainable harvesting levels with a defined reference period that is incorporated into forest management planning that specifies that benefits should not decrease over time. The yields of products are measured in a way that gives regard to nutrient offtake.

Standard References: SFM: Annex 2: I 1.1 b, I 3.1 b, I 3.2 a, I 3.3 a,· GL 3.3  
SPM: 3C practices  
Page reference in Appendix 3: p.128

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard requires forest managers to address regulation (allocations for game), monitoring (recorded production figures) and control (licenses and permits) for non-timber products. The requirement is not applicable to plantation management in Italy. The Italian Civil Code provides for access to all land for hunting and fishing purposes; licensing of this activity is provided by state and provincial authorities.

Standard References: SFM: Annex 2: I 3.5.a, I 3.5.b  
Page reference in Appendix 3: p.128

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.3.8**

Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.

**Evidence:** The Standard requires infrastructure necessary for the harvest, utilization, removal and other management activities to be planned, established and maintained, specifying compatibility with an efficient utilisation of goods and services, and minimal impact of river beds and water courses, and that "maintenance must minimise the negative impacts"

Standard References: Annex 2: I 3.5 a, I 3.5 b

**Consultant's Assessment:** *Conforms*

**Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems**

***Requirement PEFC ST 1003: 2010 5.4.1***

Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.

**Evidence:** The Standard requires forest management planning to address the protection of biodiversity, native and introduced species with the overall objective of enhancing biodiversity at ecosystem level via reforestations, safeguarding of habitat and threatened species (conservation), safeguarding and protection of rare species and habitats.

Standard References: SFM: Annex 2: I 3.1 b, I 4.2 a, I 4.2 c, I 4.8 b, I 4.8 c  
SPM: Annex 5: 4A planning

Page reference in Appendix 3: p.129

**Consultant's Assessment:** *Conforms*

***Requirement PEFC ST 1003: 2010 5.4.2***

Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:

- a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;
- b) b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;
- c) c) endangered or protected genetic in situ resources; and taking into account
- d) d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.

**Evidence:** The SFM Standard requires forest management planning that addresses inventory and mapping with reference to directives for particular biotopes, rare or endangered species management, protection of biodiversity, maintaining of natural habitats for biodiversity; it also requires safeguarding of habitat and threatened species (conservation) with reference to Natura 2000 sites; the safeguarding and protection of rare species and habitats; and water source presence and management. The SPM Standard is consistent with the requirement.

Standard References: Annex 2: I 3.1 b, I 4.8 b, I 4.8 c, 4.7  
Annex 5: 4B planning

Page reference in Appendix 3 p.130

**Consultant's Assessment:** *Conforms*

***Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard requires forest owners in the management planning process (including inventory and mapping of forest resources relevant to size of property and scale of activities) to maintain or enhance

habitat for threatened or endangered communities and species through conferring with relevant agencies and specifying in forest management planning the measures to be used to protect identified threatened or endangered species. The overall intent of the forest management standard is that commercial exploitation is prohibited. This is also the case for the SPM standard, although it has limited applicability given the presence of plantations only on agricultural land.

Standard References: SFM: Annex 2: I 3.1 b, GL 4.5, I 4.5 a, I 4.8 c, I 5.3 a  
SPM: 4A planning, 4B planning

References: 'Galasso Law 431/1985'

Page reference in Appendix 3 p.130

**Consultant's Assessment:** *Conforms*

#### **Requirement PEFC ST 1003: 2010 5.4.4**

Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.

**Evidence:** The Standard requires the forest owner to complete natural regeneration of desired species of trees on harvested sites. There is provision for artificial regeneration where natural regeneration is not possible. In the case of plantations on agricultural lands, the technical guidelines provide for planting that is adequate to ensure the quantity and quality of the resource.

Standard References: SFM: Annex 2 : I 4.1.a  
SPM: Annex 5: Appendix 1 and 2

Page reference in Appendix 3: p.131

**Consultant's Assessment:** *Conforms*

#### **Requirement PEFC ST 1003: 2010 5.4.5**

For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.

**Evidence:** The Standard requires forest managers to limit the introduction of species by both type and by area, with exclusive use of materials of known provenance, and according to evaluation of the species according to management plans and previous experience with the aim of avoiding or minimising impacts. Forest managers are required to differentiate between native and introduced species and must exclusively use material of known provenance. The indicators limit the rate of change in percentage area of introduced species for the duration of the management plan and place an absolute ceiling on the percentage area of introduced species in order to avoid and/or minimise negative impacts.

Standard References: SFM: Annex 2: I 4.1 a, I 4.2 a, I 4.2 b, I 4.2 c  
SPM: Annex 5: 4B planning

Page reference in Appendix 3: p.131

**Consultant's Assessment:** *Conforms*

#### **Requirement PEFC ST 1003: 2010 5.4.6**

Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.

**Evidence:** The Standard addresses this requirement in indicator 4c, “Maintenance of appropriate biological diversity in reforestations.” The Measurement Parameters prescribe minimum levels of connectivity by identifying maximum areas of monoculture reforestation or afforestation and specified natural vegetation breaks; pre-existing natural vegetation (shrubs and wooded land as well as forests) must be safeguarded. Regarding plantation development,. the presence of forest plantations in Italy is only on agricultural land; any improvement or restoration of ecological connectivity is not applicable.

Standard References: SFM: Annex 2: 4.3c  
Reference: SPM: ‘Galasso Law 431/1985’  
Page reference in Appendix 3: p.132

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.4.7**

Genetically-modified trees shall not be used.

**Evidence:** The Standard does not permit the use of GMOs but provides an exemption in circumstances where experimentation has shown the absence of their impact. However, the GL does not have any indicators; this would effectively mean that the operational guideline cannot be implemented for such an exception. Furthermore, scheme documentation (ITA 1000) states a 'general principle' that GMOs 'must not be introduced.'

Standard References: General: Annex 1 (Introduction)  
 SFM: Annex 2: GL 2.3  
 SPM: Annex 5: 2C practices  
Page reference in Appendix 3: p.132

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.4.8**

Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.

**Evidence:** The Standard measures changes in the proportion of mixed forests (2 or more species) and mixed forests (not single stratified) under indicators 4.3a and 4.3b. In Areas for Improvement under this indicator, the Standard encourages “mixed and multi-storied cultivation models, encouraging rare species.’

Standard References: SPM: Annex 2: I 4.3.a, I 4.3.b  
 SFM: Annex 5: 4C practices  
Page reference in Appendix 3: p.133

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.4.9**

Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.

**Evidence:** The Standard explicitly addresses both coppice forests and high forest stands. Regarding coppice, the standard restricts clear fell areas in all circumstances to 10ha, to 2ha where gradients are between 50 and 80 percent, and prohibits them when the gradient is above 80 percent. Clear cutting is prohibited above 0.5ha for high forest stands.

Standard References: SFM: Annex 2: I 5.2.a  
SPM: Annex 5: 4D practices  
Page reference in Appendix 3: p.133

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard guidelines (GL 2.2) requires forest management to conduct tending and harvesting (and broader management activities) in a way that minimises soil and tree damage. These are to be addressed in a management plan I 2.2a) which itself requires the 'protection of biodiversity' and the 'maintaining of natural habitats for biodiversity' and 'increasing the health and vitality of forest'. to conduct harvest, utilization, removal and other management activities (includes tendering) in compliance with management plans that inter alia address minimising tree and soil damage.

Standard References: SFM: Annex 2: GL 2.2, I 3.1 b  
SPM: Annex 5: 4E practices  
Page reference in Appendix 3: p.134

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.4.11**

Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.

**Evidence:** The Standard is consistent with the requirement. The GL is a verbatim repetition of the requirement. The normative indicators prescribe the presence of directives and prescriptions on forest operations and infrastructure in rare, fragile and representative ecosystems.

Standard References: SFM: Annex 2: GL 4.4, I 4.4 a  
SPM: Annex 4F practices  
Page reference in Appendix 3: p.134

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.4.12**

With due regard to management objectives, measures shall be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity.

**Evidence:** The GL (4.5) contains a verbatim restatement of the requirement. The Standard requires forest owners, consistent with their current objectives and management plan, to conduct management activities to maintain the potential of property to produce forest products and other benefits sustainably. With regards to plantations, no assessment parameter or threshold is present. However, animals and grazing animals generally damage trunks and are kept from plantations and under these circumstances the establishment of a threshold and assessment parameter is not applicable.

Standard References: SFM: Annex 2: GL 4.5, I 4.5 a, I 4.5 b  
SPM: 4G planning

Page reference in Appendix 3: p.135

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.4.13**

Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.

**Evidence:** Indicator 4.6a addresses 'Dead, monumental, historical and rare tree species' under the auspices of GL 4.5, "measures for the protection of rare, threatened and endangered species and for the safeguarding of their habitat and food species." Dead, monumental and rare trees are to be left.

Standard References: SFM: Annex 2: GL 4.5, 4.6 a  
SPM: Annex 5: 4H practices

Page reference in Appendix 3: p.135

**Consultant's Assessment:** *Conforms*

**Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)**

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard addresses these requirements via measurement parameters in its forest management planning requirements, and at the operational level via indicators measurement parameters addressing protection functions, soil erosion (addressed by gradients), infrastructure and water sources..

Standard References: SFM: Annex 2: I 3.1 b, I 5.1 a, I 5.1 b, I 5.2 a, GL 3.5, I 3.5 b  
SPM: Annex 5: 5A planning

Page reference in Appendix 3: p.135

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.5.2**

Areas that fulfil specific and recognised protective functions for society shall be registered and mapped, and forest management plans or their equivalents shall take these areas into account.

**Evidence:** The Standard requires forest managers to address management objectives, location and description of resources for protective functions, the availability of information (mapping) for protective functions.

Standard References: SFM: Annex 2: I 3.1 b, I 4.8 b, I 5.1 a  
SPM: Annex 5: 5A planning  
Page reference in Appendix 3: p.135

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.5.3**

Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.

**Evidence:** The Standard requires forest management practices to minimise animal pressures (wild and domesticated, and grazing animals); it also specifically restricts operations in erosion-prone areas (high forests, coppice forests, high gradient areas).

Standard References: SFM: Annex 2: I 4.5 a, I 4.5 b, I 5.2 a, I 5.3 a  
SPM: Annex 5: 5A practices  
Page reference in Appendix 3: p.137

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.5.4**

Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.

**Evidence:**

GL 1.1. states that Forest management practices must safeguard the quantity and quality of the forest resources in the medium and long term ... by favouring techniques that minimise direct or indirect damage to forest, soil or water resources."

I4.7 states that water sources must be registered and techniques to avoid water source damage must be adopted via special procedures or regulations. Wooded areas that have a special role for water resource protection must be identified in I 5.1a. I 5.3a requires that silvicultural practices in protective forests maximise the protective function of forests.

The Standard requires forest management practices to prohibit use of pesticides and herbicides as well as limit chemical use; this is within the context of forest management planning, which addresses the minimisation of damage to water resources (above).

Standard References: SFM: Annex2: I 2.2 a, GL 2.3, GL 2.4, I 4.7 a  
SPM: Annex 5: 5B practices

Page reference in Appendix 3: p.137

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard – in delivering the requirement that forest management practices must maintain or enhance the environment and ecosystem, including air, water, soil and site quality – addresses the forestry road network in relation to 'hydro-geological balance', requires new forest road construction to ; "affect as little as possible" river beds and water courses" and "processes of erosion and the degrading of soil." The standard requires infrastructure construction to "minimize the negative environmental impacts" and prohibits soil working in any context.

Installation and maintenance of road and drainage facilities is not addressed in the Standard. However, the Standard requires compliance with all relevant laws and regulations. Municipalities must verify the conformity of forest projects to all existing legal and regulatory norms. Italian regional forest law requires adherence to technical regulations, including road drainage.

With regards to plantations, an assessment parameter and threshold is not established; however, the establishment of infrastructure on agricultural land is regulated by regional land planning and building laws covering water courses.

Standard References: SFM: Annex 2: I 3.5 a, I 3.5 b, GL 3.5, I 5.2 b, I 5.2 c  
SPM: 5c planning

Page reference in Appendix 3: p.138

**Consultant's Assessment:** *Conforms*

**Criterion 6: Maintenance of other socio-economic functions and conditions**

**Requirement PEFC ST 1003: 2010 5.6.1**

Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.

**Evidence:** The Standard text is consistent with the requirement.

With regards to plantations, no assessment parameter or threshold is established. However, the socio-economic context is different given the presence of plantations only on agricultural land. The applicability of the requirement should also be considered in a broader cultural context and appropriate policy

instruments present at the regional and national level dating back more than 30 years, in which Italian regulations subsume forestry under broader cultural, historical, recreational and agricultural practices.

Standard References: SFM: Annex 2: I 3.2 a, GL 6.1, I 6.1 a, I 6.2 a  
SPM: 6A Planning  
Page reference in Appendix 3: p.139

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.6.2**

Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.

**Evidence:** The Standard requires forest management to maintain socio-economic benefits over time; it also addresses the training, updating and informing of members of the local community and provides appropriate indicators.

On plantations, as with the respecting of multiple functions of forests, Italian plantations are established only on agricultural land and should be considered in a broader agricultural context, given that 'forest management areas' fall within agricultural areas, or are part of agroforestry systems. In these cases, the management area is within another community, as opposed to having communities within or adjacent to it.

Standard References: SFM: Annex 2: GL 6.7  
SPM: Not applicable  
Page reference in Appendix 3: p.140

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard defines property rights within the area and determines the means for establishing and documenting these rights within the forest area; it also stipulates the clarification, respect and recognition of traditional rights via historical use.

Standard References: SFM: Annex 2: I 6.3.a, I 6.3.b  
SPM : Annex 5: 6B planning  
Page reference in Appendix 3: p.140

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.6.4**

Forest management activities shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the

holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved or is in dispute there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.

**Evidence:** ILO 169 has not been signed by the Italian Government or any other European Union member states. However, there are no indigenous people living in Italy. The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) was adopted by the General Assembly on Thursday, 13 September 2007, with the positive vote of Italy. The Standard notes that the respect for regional, national and EU laws is a “compulsory prerequisite”. On the strength of these processes it is judged the PICS complies with PEFC requirements.

Reference: UN (18 March 2008), United Nations Declaration on the Rights of Indigenous Peoples. Resolution adopted by the General Assembly [without reference to a Main Committee (A/61/L.67 and Add.1)]  
Page reference in Appendix 3: p.140

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.6.5**

Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.

**Evidence:** The Standard requires forest management to improve recreational access to forest areas, in line with the forest management plan.

Regarding plantations, the requirement is addressed, but an assessment parameter and threshold is not established (see 6C Planning). However, plantations are only present on and can only be established on agricultural land. According to the Italian civil code, access to plantation forests (specifically plantations on agricultural land or otherwise) is permitted for activities such as hunting as long as the land is not enclosed for other purposes, such as to prevent damage to forests or crops. The Standard also stipulates in 6B (planning) that ‘Property rights and land tenure arrangements should be clearly defined, documented and established for the relevant forest area.’ It is the Consultant’s judgement that the establishment of these rights effectively determines the appropriateness of public access.

Standard References: SFM: Annex 2: I 6.4.a  
 SPM: Not applicable  
Page reference in Appendix 3: p.141

**Consultant’s Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.6.6**

Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.

**Evidence:** The Standard requires forest management activities to maintain special sites with unique historical, cultural and spiritual significance and is consistent with the requirement. This is not applicable to plantations, which are established only on agricultural land; and therefore part of a broader significance in terms of subsistence, health, etc. It should also be noted that the ‘Galasso Law 431/1985’ addresses sites of all cultural and historical significance.

Standard References: SFM: Annex 2: I 4.6.a, I 6.5.a  
SPM: 6D planning  
References Galasso Law 431/1985  
Page reference in Appendix 3: p.141

**Consultant’s Assessment:** *Conforms*

#### **Requirement PEFC ST 1003: 2010 5.6.7**

Forest management operations shall take into account all socio-economic functions, especially the recreational function and aesthetic values of forests by maintaining for example varied forest structures, and by encouraging attractive trees, groves and other features such as colours, flowers and fruits. This shall be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land.

**Evidence:** The Standard requires forest management operations to take into consideration ‘aesthetic aspects’, address recreation within management plans, account for recreational forest availability, and broader “social value”. Aesthetic values are also listed as a ‘general principle’ of the scheme.

The plantation standard’s guidelines include a verbatim repetition of this requirement, but does not establish an assessment parameter as this is not applicable to plantations that are only established on agricultural land (6C Practices). The Consultant’s view is that given the nature of the forest management operations within an agricultural context, other socio-economic functions (e.g. recreation, aesthetic values) are considered within broader agricultural operations and where the described aesthetic values and operations would not be appropriate. In these cases, aesthetic values would be agricultural operations rather than silvicultural. Regarding recreational values, agritourism has become a significant element of the agricultural sector in Italy and is in fact addressed within legislation.

Standard References: SFM: Annex 2: : GL 3.4, I 3.1 b, I 6.4 a, I 6.6 a; Annex 1: introduction  
SPM: 6C practices  
Page reference in Appendix 3: p.141

**Consultant’s Assessment:** *Conforms*

#### **Requirement PEFC ST 1003: 2010 5.6.8**

Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.

**Evidence:** Consistent with the requirement

Standard References: SFM: Annex 2: GL 6.7, I 6.7.a, I 6.7 b  
SPM: Annex 5: 6E planning  
Page reference in Appendix 3: p.142

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1003: 2010 5.6.9**

Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.

**Evidence:** The Standard supports forest management practices to make use of local forest-related experiences and knowledge via the Group, Territorial Association and Individual Applicants.

Standard Reference: SFM: Annex 1: 2.2.1.1 (t), 2.2.1.2 (s), 2.2.1.3 (o)  
SPM: Annex 5: 6A practices

Page reference in Appendix 3: p.143

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1003: 2010 5.6.10**

Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.

**Evidence:** The Standard requires forest management to provide for effective communication, consultation and dispute resolution via Group, Territorial Association and Individual Applicants.

Standard References: ITA 1000 2.2.1.1 (t) (w), 2.2.1.2 (s) (w), 2.2.1.3 (o) (s),  
ITA 1004 2.2.1.1 (n), ITA 2.2.1.2 (o), 5.2.

Page reference in Appendix 3: p.144

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1003: 2010 5.6.11**

Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.

**Evidence:** The Standard is consistent with the requirement. Indicator 6.8a addresses “Prevention of accidents within companies carrying out works on their own or subcontracting” and establishes thresholds for the use of safety equipment and for the identification of work sites. The Indicator also refers to Italian legislation “Dgls 81/2008”, i.e. Legislative Decree no 81 of 2008.

Article 31 states that employers must organize prevention and protection functions within a company or the production unit, or appoints people or external services, established within the employers' associations and joint organisms. The functions provides for:

- identification of risk factors, risk assessment and identification of measures for safety and health at workplace, in compliance with the regulations in force on the basis of a specific knowledge of company organization;
- development, as far as it is competent, of prevention and protection measures and monitoring systems of such measures;
- development of safety procedures for the different company activities;

- proposal of information and training programmes for workers;
- consultations concerning health and safety at work, as well as participation at scheduled meetings;
- provision of information on the topic to workers.

Reference: Annex I: I 6.8a Compulsory works safety legislation Dgls 81/2008

Standard References: SFM: Annex 2: I 6.8.a, 6.8.b  
SPM: Annex 5: 6B practices

Page reference in Appendix 3: p.145

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.6.12**

Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.

**Evidence:** The Standard is consistent with the requirement. Normative indicator 6.8b -- Training courses concerning safety if relevant—includes a requirement for ‘sufficient training’ on safety. This is repeated in 6B practices.

It should be noted that the standard translates the Italian ‘sicurezza’ as ‘security’ rather than ‘safety’, as the Italian word translates to both. The Consultant assesses this as a translation error that does not affect the implementation of the standard.

Standard References: SFM: Annex 2: I 6.8.a, 6.8.b  
SPM: Annex 5: 6B practices

**Consultant's Assessment:** *Conforms*

**Requirement PEFC ST 1003: 2010 5.6.13**

Forest management shall comply with fundamental ILO conventions.

**Evidence:** All Fundamental and Priority ILO Conventions have been ratified by the Italian Government. Fundamental conventions are summarised below:

Treaty	Date	Status
C029 - Forced Labour Convention, 1930 (No. 29)	18 Jun 1934	In Force
C087 - Freedom of Association and Protection of the Right to Organise	13 May 1958	In Force
C098 - Right to Organise and Collective Bargaining Convention, 1949	13 May 1958	In Force
C100 - Equal Remuneration Convention, 1951 (No. 100)	08 Jun 1956	In Force
C105 - Abolition of Forced Labour Convention, 1957 (No. 105)	15 Mar 1968	In Force
C111 - Discrimination Convention, 1958	12 Aug 1963	In Force
C138 - Minimum Age Convention, 1973 (No. 138)	28 Jul 1981	In Force
C182 - Worst Forms of Child Labour Convention, 1999 (No. 182)	07 Jun 2000	In Force

References: International Labor Organisation (2016). ‘Ratifications by Country – Italy) Accessed at <http://www.ilo.org/ilolex/english/newratframeE.htm>

Page reference in Appendix 3: p.145

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** Information gathering for forest management activities includes scientific research across a range of applicable indicators. The Standard states that PEFC Italy contributes to forestry research. The monitoring of implementation of forest management plan (including harvesting, utilization, removal and other management activities) provides a benchmark for management activities relevant landowner objectives. These results represent a contribution to research activities at individual landowner and aggregated levels, as well as source of data collection to advise sustainable forest management for non-industrial forest owners.

Standard References: Annex 1 (all); Annex 2 (all)

Page reference in Appendix 3: p.146

**Consultant's Assessment:** Conforms

**Criterion 7: Compliance with legal requirements**

**Requirement PEFC ST 1003: 2010 5.7.1**

Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.

**Evidence:** The Standard requires forest management activities to comply with all relevant regional, national and EU laws.

Standard References: Annex 1 2.1; Annex 4: 2.1; Annex 2 (Rules),

Page reference in Appendix 3: p.146

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1003: 2010 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.

**Evidence:** The Standard a surveillance system for the "forest's protection from illegal activities and reporting to competent authorities." Regarding plantations on agricultural lands, a broader prohibition on compliance with all relevant legislation and regulations would therefore cover all laws appropriate to management of agricultural land.

Standard References: Annex 2: 2.2a

Page reference in Appendix 3: p.146

**Consultant's Assessment:** *Conforms*

#### **4.3 Overall Assessment**

The API's *2010-2015 Standards of Sustainability for Forest Certification* conforms to PEFC *Sustainable Forest Management – Requirements* as specified in document PEFC ST 1003: 2010.

## 5. Assessment of Group Certification Model

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### 5.1 Introduction

*The following chapter assesses the PIS's group certification models against Group Forest Management Certification – Requirements (PEFC ST 1002:2010). For each requirement stipulated in the standard, the consultants have assessed the PIS' evidence, together with reference to the relevant scheme documentation and conformity judgement.*

The PIS offers two pathways for eligible landowners to seek group certification under PIS; namely, Territorial Group Association (TA) certification and Group Certification (GR).

TA certification is the process by which groups of forest owners are audited and certified by an accredited certification body under a single third-party issued certificate. A TA is a group entity recognised by PEFC Italy as representing more than 50 per cent of planned forests in a particular region. A region is defined as a "Homogeneous territory that is clearly geographically and administratively delineated". There may be only one TA per region. The requirements for TA seeking certification are evaluated for each TA (group organizational level). The TA is responsible for ensuring that operations are consistent with PIS requirements. Each forest owner who is a member of TA must demonstrate conformity to *ITA 1001-1* as a minimum and to *ITA 1001-2 (Annex 3)*.

GR certification is the process by which groups of forest owners are audited and certified by an accredited certification body under a single third-party issued certificate. A GR is a group entity recognised by PEFC Italy that is an aggregate of forest owners and/or managers. The requirements for a GR seeking certification are evaluated for each GR (group organizational level). The GR is responsible for ensuring that operations are consistent with PIS requirements. Each forest owner or manager who is a member of a GR must demonstrate conformity to *ITA 1001-1 and/or ITA 1004-1*.

The key difference between a TA and GR is that a TA represents an administrative region; but a GR represents members of the participants in the Group Organisation.

The requirements for TA and GR entities are established in ITA 1000. **However, it should be noted that the requirements for Applicants for GR (2.2.1.2) contains an incorrect reference to TA, rather than GR.**

### 5.2 Assessment Results

In the assessment detailed below the requirement numbers refer to the specific requirements specified in PEFC ST 1002: 2010.

#### 5.2.1 General <sup>13</sup>

##### **Requirement PEFC ST 1002: 2010 4.1 a**

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,

**Evidence:** The definition is consistent with the requirement; it applies to both TA and GR

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<sup>13</sup> Requirements 4.1, in *Group Forest Management Certification – Requirements (PEFC ST 1002:2010)* and *PART II: Standard and System Requirement Checklist for Group Forest Management Certification*

Standard References: Annex 1: 1.3.1  
Page reference in Appendix 3: p.102

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1 b**

b) the group entity,

**Evidence:** There are two types of group entity, the Territorial Association (TA) and Group Organisation (GR). Both are defined as representing the participants, with overall responsibility for ensuring the conformity of forest management in the certified area to the PEFC Italy scheme.

Standard References: Annex 1: 1.3.1  
Page reference in Appendix 3: p.102

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1 c**

c) the participant,

**Evidence:** The definition for 'participant' is consistent with the requirement and repeats the definition used in PEFC ST 1002:2010.

Standard References: Annex 1: 1.3.1  
Page reference in Appendix 3: p.102

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1 d**

d) the certified area,

**Evidence:** The definition for 'certified area' is consistent with the requirement and repeats the definition used in PEFC 1002: 2010 for group organisations.

Standard References: Annex 1: 1.3.1  
Page reference in Appendix 3: p.102

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1 e**

e) the group forest certificate,

**Evidence:** The definition for 'group forest certificate' is consistent with the requirement and repeats the definition used in PEFC 1002:2010. The definition for 'Territorial Group Forest Certificate' adds stipulations about which participants are certified under the certificate.

Standard References: Annex 1: 1.3.1  
Page reference in Appendix 3: p.102

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1 f**

f) the document confirming participation in group forest certification.

**Evidence:** The definition for 'group forest certificate' is consistent with the definition provided in PEFC 1002:2010. The definition for 'territorial group forest certificate' is also consistent; it adds stipulations about which participants are certified.

Standard References: Annex 1: 1.3.1

Page reference in Appendix 3: p.103

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1.2**

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

**Evidence:** The definition is consistent with the requirement and is repeated verbatim for TAs, and for GRs.

Standard References: Annex 1: 2.2.1.1 (p), 2.2.1.2 (p)

Page reference in Appendix 3: p.103

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1.3**

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

**Evidence:** The PICS requires both TA and GR participants to be subject to requirements defined in SFM documentation that stipulates that all activities are centrally administered and reviewed.

Standard References: Annex 1 3.2

Page reference in Appendix 3: p.104

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.1.4**

The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.

**Evidence:** GRs and TAs are required to

- Organize an annual internal monitoring programme on Group participants;
- Ensure implementation of corrective action and monitor conformity as part of regular schedule of monitoring; and

- Adhere to a minimal requirements for sampling methodology for monitoring that provides a confidence level for the entire group.

Standard References: Annex 1: 2.2.1.1 (h), 2.2.1.2 (h)  
Page reference in Appendix 3: p.105

**Consultant's Assessment:** Conforms

## 5.2.2 Functions and responsibilities of the group entity<sup>14</sup>

### **Requirement PEFC ST 1002: 2010 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;

**Evidence:** The Standard repeats the requirement verbatim and is consistent with the requirement for both TAs and GRs.

Standard References: Annex 1: 2.2.1.1 (a), 2.2.1.2 (a)  
Page reference in Appendix 3: p.105

**Consultant's Assessment:** Conforms

### **Requirement PEFC ST 1002: 2010 4.2.1**

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;

**Evidence:** The Standard repeats the requirement verbatim and is consistent with the requirement for both TAs and GRs.

Standard References: Annex 1: 2.2.1.1 (b), 2.2.1.2 (b)  
Page reference in Appendix 3: p.106

**Consultant's Assessment:** Conforms

### **Requirement PEFC ST 1002: 2010 4.2.1**

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

**Evidence:** Both TAs and GRs must “Produce a SFM handbook in which the requirements for implementation of the whole group organisation with the sustainable forest management standard are elaborated.”

Standard References: Annex 1: 2.2.1.1 (e), 2.2.1.2 (e)  
Page reference in Appendix 3: p.106

<sup>14</sup> Requirements 4.2, in *Group Forest Management Certification – Requirements (PEFC ST 1002:2010)* and *PART II: Standard and System Requirement Checklist for Group Forest Management Certification*

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.2.1**

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;

**Evidence:** TAs and GRs are required to

- Keep and update records (names, land register's location and concerned/certified areas) of TA and participants to the certification, and periodically send it to the CB; each new participant to the TA certification will be included in the TA certification only after the CB's surveillance audit;
- Keep and send within a month after the audit, record of participants the certification to PEFC Italy, specifying names, location and concerned/certified areas and subsequently informing PEFC-Italy of exclusions and new entries. The commitment of participants may be based either on individual commitment or on a majority decision of a forest owner's organisation on behalf of the forest owners/managers that they represent in the region

Standard References: Annex 1: 2.2.1.1 (l) (m), 2.2.1.2 (l) (m)

Page reference in Appendix 3: p.106

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.2.1**

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;

**Evidence:**

- The TA must "Gather and accept the individual assent applications of the participants, which are accompanied by an obligation to comply with the PEFC-Italy sustainable forest management standard and other applicable requirements of the PEFC-Italy forest certification scheme";
- The GR must "Draw up, update and maintain the individual assent applications of the owners, which are accompanied by an obligation deed to the PEFC Italian scheme requirements".

Further,

- The TA must "Inform, with a dedicated document (for example a Regulation), the members and the interested parties to the certification of their rights and duties and implement procedures which ensure the fulfilment of their own requirements; check that the owners must respect the points of the paragraph 2.2.1.1.1"; and

- The GR must “Inform the members and the key players in the certification of their rights and duties and initiate procedures which ensure the fulfilment of their own duties; check that the owners respect the points of the paragraph 2.2.1.2.1”

Standard References: Annex 1: 2.2.1.1 (g), 2.2.1.2 (g)  
Page reference in Appendix 3: p.108

**Consultant’s Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.2.1**

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

**Evidence:** The Standard repeats the requirement verbatim and is consistent with the requirement for both TAs and GRs.

Standard References: Annex 1: 2.2.1.1 (n), 2.2.1.2 (n)  
Page reference in Appendix 3: p.108

**Consultant’s Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.2.1**

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;

**Evidence:** Both TAs and GRs must

- Produce a SFM handbook which elaborates the requirements for the SFM standard and CoC certification if required;
- Arrange, update and distribute documentation, information and necessary forms to the participants in order to facilitate voluntary participation in the system

Standard References: Annex 1: 2.2.1.1 (e) (f), 2.2.1.2 (e) (f)  
Page reference in Appendix 3: p.109

**Consultant’s Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.2.1**

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

**Evidence:** The TA and GR are required to “Organize an annual internal monitoring programme on Group participants and collaborate in the audits run by the CB.”

Standard References: Annex 1: 2.2.1.1 (h), 2.2.1.2 (h)  
Page reference in Appendix 3: p.109

**Consultant’s Assessment:** Conforms

**Requirement**

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.

**Evidence:** Both TAs and GRs are required to organise meetings with ‘interested parties’ as well as with the participation of the CB on an annual basis. The objective of the meeting—also referred to as a public consultation – is to gather information on all aspects of certification that are considered relevant. The Standard also requires TAs and GRs to make available information regarding the audit activity and compliance.

Standard References: Annex 1: 2.2.1.1 (t) (u), 2.2.1.2 (s) (t)  
Page reference in Appendix 3: p.110

**Consultant’s Assessment:** *Conforms*

### 5.2.3 Function and responsibilities of participants<sup>15</sup>

#### **Requirement PEFC ST 1002: 2010 4.3.1**

The forest certification scheme shall define the following requirements for the participants:

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

**Evidence:** Participants in both TA and GR schemes are required to confirm assent to their respective association or group via both application and conformed assent; they are also required to indicate to the entity in written form the forest areas under management and which areas are candidates for certification, as well as formally conform to the requirements imposed by the PEFC Italy certification scheme.

Standard References: Annex 1: 2.2.1.1.1 (c) (d) (h), 2.2.1.2.1 (c) (d) (h)  
Page reference in Appendix 3: p.111

**Consultant’s Assessment:** *Conforms*

#### **Requirement PEFC ST 1002: 2010 4.3.1**

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

**Evidence:** The Standard is consistent with the requirement for both TAs and GRs and states in both cases that that participants must “conform to the requirements imposed by the PEFC Italy Certification Scheme.”

Standard References: Annex 1: 2.2.1.1.1 (d), 2.2.1.2.1 (d)  
Page reference in Appendix 3: p.111

<sup>15</sup> Requirements 4.3, in *Group Forest Management Certification – Requirements (PEFC ST 1002:2010) and PART II: Standard and System Requirement Checklist for Group Forest Management Certification*

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.3.1**

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;

**Evidence:** The Standard repeats the requirement verbatim and is consistent with the requirement for both TAs and GRs..

Standard References: Annex 1: 2.2.1.1.1 (j), 2.2.1.2.1 (j)  
Page reference in Appendix 3: p.111

**Consultant's Assessment:** Conforms

**Requirement PEFC ST 1002: 2010 4.3.1**

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

**Evidence:** The Standard repeats the requirement verbatim and is consistent with the requirement for both TAs and GRs.

Standard References: Annex 1: 2.2.1.1.1 (k), 2.2.1.2.1 (k)  
Page reference in Appendix 3: p.112

**Consultant's Assessment:** Conforms

### 5.3 Overall Assessment

On the basis of the evidence presented above it is assessed that the group certification programs offered by PEFC Ital meet the requirements of PEFC Group Forest Management Certification Requirements as documented in PEFC ST 1002: 2010, in areas of

- (i) General requirements;
- (ii) Functions and responsibilities of group entity (either IMG or Regional State Group);
- (iii) Functions and responsibilities of the certified forest owners (participants).

## 6. Assessment of Chain of Custody Standard

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The PIS does not maintain a chain of custody certification standard for products produced from PIS certified forest areas.

Annex 10 of the standard documentation states that “PEFC Italy has adopted and translated in Italian PEFC ST 2002:2013.”

Accordingly an assessment against PEFC Chain of Custody of Forest Based Products Requirements (PEFC ST 2002: 2010) is not applicable to this Report.

## 7. Assessment of Certification and Accreditation Procedures

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### 7.1 Introduction

The following chapter assesses the PIS's certification and accreditation procedures for conformity against PEFC Annex 6 (Certification and Accreditation Procedures). For each requirement stipulated in the standard, the consultants have assessed the PIS' evidence, together with reference to the relevant System Documentation (SD) and conformity judgement.

The agreements are included as normative reference documents, and outline requirements which accredited certification bodies must meet, including relevant PEFC and PIS documentation.

### 7.2 Assessment Results

#### 7.2.1 Certification Bodies<sup>16</sup>

##### **Requirement Annex 6, 3.1**

Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?

**Evidence:** "Certification is carried out by CBs, third-party independent bodies, who are accredited by a national AB which is a member of the IAF – International Accreditation Forum (for example ACCREDIA in Italy) - for the certification of SFM and of the CoC of forest derived products which have been subsequently notified by PEFC Italy."

Standard References: Annex 1: 2.2.3

Page reference in Appendix 3: p.147

**Consultant's Assessment:** *Conforms*

##### **Requirement Annex 6, 3.1**

Does the scheme documentation require that certification body for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil requirements defined in:

- a) ISO 17021 if certification is carried out as management system certification;
- b) ISO Guide 65 if certification is carried out as product certification;
- c) Other requirements for certification bodies defined by national accreditation body.

**Evidence:** The scheme documentation requires that certification may only be carried out by CBs accredited by organisations that are members of the IAF "in conformity with the norm EN 45011, ISO Guide 65 and PEFC (CoC and/or SFM – including SMPP) may deliver PEFC certification, with subsequent notification by PEFC Italy"

Standard References: Annex 6: 2

Page reference in Appendix 3: p.147

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<sup>16</sup> Requirement 3, in *Certification and Accreditation Procedures* (Annex 6) and *PART IV: Standard and System Requirement Checklist for Certification and Accreditation Procedures*

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 3.1**

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

**Comment:** The scheme documentation requires that certification may only be carried out by CBs accredited by organisations that are members of the IAF “in conformity with the norm EN 45011, ISO Guide 65 and PEFC (CoC and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy”

Standard References: Annex 6: 2

Page reference in Appendix 3: p.147

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 3.1**

Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?

**Evidence:** The scheme documentation requires that certification may only be carried out by CBs accredited by organisations that are members of the IAF “in conformity with the norm EN 45011, ISO Guide 65 and PEFC (CoC and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy”.

Scheme documentation also states that “In order to guarantee a reliable, accurate and efficient way to carry out the audits to evaluate the SFM and SPM, the audit personnel must possess at least the following fundamental skills:

- a) knowledge of PEFC-Italy documents on the certification scheme to be evaluated
- b) knowledge of the UNI EN ISO 19011 standard and thorough knowledge of the corresponding evaluation techniques and methods; and
- c) specific technical knowledge of the processes implemented in the field of the certification scheme being evaluated and sufficient knowledge of the relative products/services, including the applicable legislative provisions regarding the applicable sectors (qualification, e.g. diploma, degree etc.)

The documentation also states that auditors must “have a degree in Forestry or a high school diploma in forestry (in the case of the SPM, a Degree in Agrarian Sciences is considered equivalent for the qualification of Auditor). If the certification is carried out by a single Auditor (AU), they must have a Degree in Forestry.”

Standard References: Annex 6: 2, 4.1

Page reference in Appendix 3: p.148

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 3.1**

Does the scheme documentation require that certification bodies carrying out C-o-C certifications shall have technical competence in forest based products procurement and processing and material flows in different stages of processing and trading?

**Evidence :** “The certification body requirements for Chain of Custody follow the PEFC ST 2003:2012.”

Standard References: Annex 6: 1

Page reference in Appendix 3: p.148

**Consultant’s Assessment:** Conforms

#### **Requirement Annex 6, 3.1**

Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management or C-o-C certifications?

**Evidence:** Scheme documentation states: “In order to guarantee a reliable, accurate and efficient way to carry out the audits to evaluate the SFM and SPM, the audit personnel must possess at least the following fundamental skills:

- a) knowledge of PEFC-Italy documents on the certification scheme to be evaluated
- b) knowledge of the UNI EN ISO 19011 standard and thorough knowledge of the corresponding evaluation techniques and methods; and
- c) specific technical knowledge of the processes implemented in the field of the certification scheme being evaluated and sufficient knowledge of the relative products/services, including the applicable legislative provisions regarding the applicable sectors (qualification, e.g. diploma, degree etc.)

Standard References: Annex 6: 4.1

Page reference in Appendix 3: p.148

**Consultant’s Assessment:** Conforms

#### **Requirement Annex 6, 3.2**

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

**Evidence:** The scheme documentation describes requirements for CBs regarding the competence and technical knowledge of their auditors via maintenance of qualifications via both continuous work and training. It places sole responsibility on the CB to ensure the qualifications of audit personnel.

Standard References: Annex 6: 4.1.1

Page reference in Appendix 3: p.149

**Consultant’s Assessment:** Conforms

#### **Requirement Annex 6, 3.2**

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?

**Evidence:** Scheme documentation states: “In order to guarantee a reliable, accurate and efficient way to carry out the audits to evaluate the SFM and SPM, the audit personnel must possess at least the following fundamental skills:

- a) knowledge of PEFC-Italy documents on the certification scheme to be evaluated
- b) knowledge of the UNI EN ISO 19011 standard and thorough knowledge of the corresponding evaluation techniques and methods; and
- c) specific technical knowledge of the processes implemented in the field of the certification scheme being evaluated and sufficient knowledge of the relative products/services, including the applicable legislative provisions regarding the applicable sectors (qualification, e.g. diploma, degree etc.)

It also states that “auditors must satisfy the requirements described in points 7.2, 7.3, 7.4, 7.5 and 7.6 of ISO 19011:2003”.

Standard References: Annex 6: 4.1, 4.1.1  
Page reference in Appendix 3: p.149

**Consultant’s Assessment:** *Conforms*

#### **Requirement Annex 6, 3.2**

Does the scheme documentation include additional qualification requirements for auditors carrying out forest management or chain of custody audits against a scheme specific standard?

**Evidence:** Scheme documentation states that auditors must also meet these requirements:

“Basic work experience: the auditor must have worked at least three years in a technical capacity, either as an employee or freelance. This work must be connected with Forest Management (for example forestry, forest settlement, forestry pathologies and entomology, forestry economics and legislation, the uses of woodland, hydraulic-forest systems, forest systems planning, etc.); and Specific training for the SFM/SPM PEFC scheme of at least 16 hours, as recognized by PEFC Italy.”

In addition, scheme documentation requires that auditors utilise ‘technical experts’ in specific fields that must meet additional requirements:

- a) previous work experience of at least 3 years, in duties connected with SFM or SPM;
- b) and demonstrated evidence that the EXP [technical expert/s] is still active or, in any event, is capable as regards the above duties.

Standard References: Annex 6: 4.1.1, 4.2  
Page reference in Appendix 3: p.149

**Consultant’s Assessment:** *Conforms*

#### **7.2.2 Certification procedures<sup>17</sup>**

#### **Requirement Annex 6, 4**

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

**Evidence:** Certification bodies are required to conform with inter alia ISO/IEC 17065; this norm establishes that organisations meeting this requirement must establish such internal procedures (chapter 8.6).

Standard References: Annex 6: 4.1

<sup>17</sup> Requirement 4, in *Certification and Accreditation Procedures* (Annex 6) and *PART IV: Standard and System Requirement Checklist for Certification and Accreditation Procedures*

References: ISO/IEC 17065: 8.6  
Page reference in Appendix 3: p.150

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 4**

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

**Evidence:** Scheme documentation states that accredited CBs must be accredited by “a member of the IAF (e.g. ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC”. This implies that the applied certification procedures are compatible.

Standard References: Annex 6: 2  
Page reference in Appendix 3: p.150

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 4**

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

**Evidence:** Scheme documentation states that accredited CBs must be accredited by “a member of the IAF (e.g. ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC”. This implies that the applied certification procedures are compatible.

Standard References: Annex 6: 2  
Page reference in Appendix 3: p.150

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 4**

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

**Evidence:** Scheme documentation states that “audits are carried out in accordance with the Norm UNI EN ISO 19011.” For chain of custody audits, requirements follow PEFC ST 2003:2012

Standard References: Annex 6: 1, 3.1  
Page reference in Appendix 3: p.151

**Consultant's Assessment:** Conforms

**Requirement**

Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates?

**Evidence:** Scheme documentation states that: The outcome of the decision shall be communicated to both the applicant and PEFC Italy as the certificate is issued, through the sending of the certificate (for PEFC Italy, it is sufficient to send the identifying data of the certificate holder).”

Standard References: Annex 6: 3.4  
Page reference in Appendix 3: p.151

**Consultant’s Assessment:** Conforms

#### **Requirement Annex 6, 4**

Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?

**Evidence:** The scheme documentation states: “The CB must monitor the usage of the Logo issued to a CB, GR and RA. The control of the proper usage of the sub-licences issued by the GR and RA is a duty of licence holders themselves, who must verify that the Logo usage rules included in the contract are observed.”

Standard References: Annex 6: 3.5  
Page reference in Appendix 3: p.151

**Consultant’s Assessment:** Conforms

#### **Requirement Annex 6, 4**

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

**Evidence:** The scheme documentation states: “The CB must conduct surveillance audits in order to verify that the SFM/SPM system remain in conformity with the requirements of the Italian PEFC certification scheme. These surveillance audits occur at least once a year from the date of certification.”

Standard References: Annex 6: 3.6.1  
Page reference in Appendix 3: p.151

**Consultant’s Assessment:** Conforms

#### **Requirement Annex 6, 4**

Does a maximum period for re-assessment audit not exceed five years for both forest management and chain of custody certifications?

**Evidence:** Scheme documentation states: “Prior to the end of the certificate’s five (5) year validity period, a certification renewal audit is carried out.”

Standard References: Annex 6: 3.6.2  
Page reference in Appendix 3: p.152

**Consultant’s Assessment:** Conforms

#### **Requirement Annex 6, 4**

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

**Evidence:** Group entities (both GR and TA) are required to organise meetings with “interested parties”, which are also referred to as “public consultations” in the scheme documentation. The documentation states that “The information gathered during public consultations (through any means, be it written, video or audio) must be conserved and used as documented evidence during the audit by the CB.”

Standard References: Annex 1: 2.2.1.1 (q), 2.2.1.2 (q), 2.2.1.3 (n)  
Page reference in Appendix 3: p.152

**Consultant’s Assessment:** *Conforms*

#### **Requirement Annex 6, 4**

Does the scheme documentation include requirements for public availability of certification report summaries?

**Evidence:** Scheme documentation states that “The CB must provide an audit summary (whose minimum contents are included in Appendix 2), which must be validated by the certifying organisation and sent to PEFC Italy within a month of the communication on the certification/surveillance; this audit summary must be made available to the public by the certified entity, and must be easily available and traceable (via PEFC Italy web site or in any other manner decided by the certified entity).”

Standard References: Annex 6: 3.2.1  
Page reference in Appendix 3: p.152

**Consultant’s Assessment:** *Conforms*

#### **Requirement Annex 6, 4**

Does the scheme documentation include additional requirements for certification procedures?

**Evidence:** The scheme documentation procedure includes additional requirements related to sampling procedures.

Standard References: Annex 6: 3.2  
Page reference in Appendix 3: p.152

**Consultant’s Assessment:** *Conforms*

### **7.2.3 Accreditation procedures<sup>18</sup>**

#### **Requirement Annex 6, 5**

Does the scheme documentation require that certification bodies carrying out forest management and/or chain of custody certification shall be accredited by a national accreditation body?

<sup>18</sup> Requirement 5, in *Certification and Accreditation Procedures* (Annex 6) and *PART IV: Standard and System Requirement Checklist for Certification and Accreditation Procedures*

**Evidence:** Scheme documentation states that: “Certification is carried out by CBs, third-party independent bodies, who are accredited by a national AB which is a member of the IAF – International Accreditation Forum (for example ACCREDIA in Italy) - for the certification of SFM and of the CoC of forest derived products which have been subsequently notified by PEFC Italy.”

Standard References: Annex 1: 2.2.3

Page reference in Appendix 3: p.152

**Consultant’s Assessment:** *Conforms*

#### **Requirement Annex 6, 5**

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

**Evidence:** Scheme documentation states that “every issued certificate must include information on the national accreditation body (including the accreditation number for the CB and the accreditation symbol of the AB and of the CB).”

Standard References: Annex 6: 3.4

Page reference in Appendix 3: p.153

**Consultant’s Assessment:** *Conforms*

#### **Requirement Annex 6, 5**

Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF’s special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?

**Evidence:** Scheme documentation states: “Only CBs accredited by a national accreditation organisation that is a member of the IAF (e.g.ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC (and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy.”

Standard References: Annex 6: 2

Page reference in Appendix 3: p.153

**Consultant’s Assessment:** *Conforms*

#### **Requirement Annex 6, 5**

Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?

Scheme documentation states: “Only CBs accredited by a national accreditation organisation that is a member of the IAF (e.g.ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC (and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy.”

Standard References: Annex 6: 2  
Page reference in Appendix 3: p.153

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 5**

Does the scheme documentation require that certification body undertake chain of custody certification against Annex 4 as “accredited certification” based on ISO Guide 65?

**Evidence :** “The certification body requirements for Chain of Custody follow the PEFC ST 2003:2012.”

Standard References: Annex 6: 1  
Page reference in Appendix 3: p.154

**Consultant's Assessment:** Conforms

**7.2.4 PEFC Notification of Certification Bodies<sup>19</sup>**

**Requirement Annex 6, 6**

Does the scheme documentation include a mechanism for PEFC notification of certification bodies?

**Evidence:** Scheme documentation states: “notification is granted following presentation of the request using the specific and fully compiled form provided by PEFC Italy and a copy of a valid and updated accreditation certificate.”

Standard References: Annex 6: 2  
Page reference in Appendix 3: p.154

**Consultant's Assessment:** Conforms

**Requirement Annex 6, 6**

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

**Evidence:** Scheme documentation states: “PEFC Italy’s notification process is non-discriminatory allowing all CBs access to the PEFC Italian certification scheme.”

Standard References: Annex 6: 2  
Page reference in Appendix 3: p.154

**Consultant's Assessment:** Conforms

**7.3 Overall Assessment**

On the evidence presented above it is assessed that the PEFC Italy conforms to PEFC’s *Certification and Accreditation Procedures* (Annex 6) in:

- Meeting competence criteria for accrediting certification bodies;
- Use of competent and qualified auditors by certification bodies;

<sup>19</sup> Requirement 6, in *Certification and Accreditation Procedures* (Annex 6) and *PART IV: Standard and System Requirement Checklist for Certification and Accreditation Procedures*

- Certification bodies complying with certification procedures.

## Appendix 2. ITS Global Stakeholder Questionnaire

To inform their assessment of PIS' standard setting process against PEFC requirements, ITS Global distributed a stakeholder survey. Stakeholders included a broad range of organizations and individuals involved in the standard setting process (including academics, ENGO, government agencies and forest services, and private forest owners), with contact details supplied by the API. The survey was distributed via email, and recipients were given two weeks to respond.

### Call for comments on the PIS revised standard and revision process - Stakeholder Survey

In 2015 PEFC Italy adopted revised standards for the Italian PEFC Certification Scheme for Sustainable Forest Management and Sustainable Plantation Management, following a review of the standard. PEFC Italy is endorsed under the global umbrella certification system – the Programme for Endorsement of Forestry Certification (PEFC). PEFC endorsement requires that the revised PEFC Italy standards are assessed for conformity against the requirements stipulated in PEFC's international standards and guidelines.

PEFC has commissioned independent consultants ITS Global to undertake a conformity assessment of the revised PEFC Italy standard against PEFC requirements. In order to inform the assessment, ITS Global is asking stakeholders involved in for their input and comments on the revision process and revised standard. ITS Global would greatly appreciate comments and input based on the following questionnaire. Respondents may specify if they wish to remain anonymous. The deadline for returning comments is 28 September 2016. Additional comments can also be submitted before the deadline directly to Khalil Hegarty at k.hegarty[at]itsglobal.net.

NAME OF INDIVIDUAL AND ORGANISATION | POSTAL ADDRESS | DATE

DESCRIPTION OF RELATIONSHIP WITH PEFC Italy :

1. When were you invited to participate to the revision process of PEFC Italy?
2. In your view, were all interested parties given the possibility to participate and contribute to the scheme development and revision?
3. Did the organisers provide you with relevant material to participate in the scheme development and revision?
4. Was the development and revision process well planned and structured?
5. In your view, were your views appropriately considered during the development and revision process?
6. Was a consensus reached in the development of the certification criteria?
7. Did the participating stakeholders represent the range of interests in forest management in your country? If not, which other interests groups do you think should have participated?
8. Do you believe any specific aspects of the scheme deserve further consideration?

The survey was sent to the following recipients:

Name Organizations	Name	Email
Provincia Autonoma Trento	Francesco Dellagiacomà	<a href="mailto:Francesco.dellagiacomà@provincia.tn.it">Francesco.dellagiacomà@provincia.tn.it</a>
Provincia Autonoma Bolzano	Marco Pietrogiovanna	<a href="mailto:marco.pietrogiovanna@provincia.bz.it">marco.pietrogiovanna@provincia.bz.it</a>
Federforeste	Pietro Torchio	<a href="mailto:piero.torchio@federforeste.it">piero.torchio@federforeste.it</a>
Confagricoltura	Concezio Gasbarro	<a href="mailto:gestifor@gmail.com">gestifor@gmail.com</a>
Consorzio Amiata	Francesca Galli	<a href="mailto:consorzio.foreste@inwind.it">consorzio.foreste@inwind.it</a>

Aziende Agricole diocesane riunite Srl	Leonardo Nocentini	<a href="mailto:l.nocentini@gmail.com">l.nocentini@gmail.com</a>
Asprolegno*	Fabio Fracchia	<a href="mailto:f.fracchia@inwind.it">f.fracchia@inwind.it</a>
Regione Veneto	Giovanni Carraro e Isabella Pasutto	<a href="mailto:Giovanni.Carraro@regione.veneto.it">Giovanni.Carraro@regione.veneto.it</a>
Regione Emilia Romagna	Enzo Valbonesi (Ambrosini) 0515276947	<a href="mailto:segrprn@regione.emilia-romagna.it">segrprn@regione.emilia-romagna.it</a>
Regione Friuli Venezia Giulia	Maria Cristina D'Orlando	<a href="mailto:mariacristina.dorlando@regione.fvg.it">mariacristina.dorlando@regione.fvg.it</a>
Federlegno-Arredo	Claudio Garrone	<a href="mailto:Claudio.garrone@federlegnoarredo.it">Claudio.garrone@federlegnoarredo.it</a>
Conlegno	Maria Rita Gallozzi	<a href="mailto:Mrita.gallozzi@conlegno.eu">Mrita.gallozzi@conlegno.eu</a>
Legambiente	Federica Barbera 06862681-364	<a href="mailto:f.barbera@legambiente.it">f.barbera@legambiente.it</a>
Amici della Terra	Monica Tommasi	<a href="mailto:tommasi@amicidellaterra.it">tommasi@amicidellaterra.it</a>
Fare Ambiente	Massimo Scarpetta	<a href="mailto:massimo@massimoscarpetta.it">massimo@massimoscarpetta.it</a>
Colafor	Gaspar Rino Talucci	<a href="mailto:talucci.rino@libero.it">talucci.rino@libero.it</a>
Conaibo	Livio Bozzolo e Giulio Zanetti	<a href="mailto:bozzololivio@alice.it">bozzololivio@alice.it</a>
Legnoservizi	Daniele Peresson	<a href="mailto:daniele.peresson@gmail.com">daniele.peresson@gmail.com</a>
CONAF	Mattia Busti	<a href="mailto:Mattia.busti@conaf.it">Mattia.busti@conaf.it</a>
Geoponica	Alessandro Pansecco	<a href="mailto:a.pansecco@geoponica.it">a.pansecco@geoponica.it</a>
Consorzio regionale forestale FORESTARE	Benito Scazzota	<a href="mailto:benitosca@gmail.com">benitosca@gmail.com</a>
Aalsea*	Paolo Mori	<a href="mailto:paolomori@compagniadelleforeste.it">paolomori@compagniadelleforeste.it</a>
AIAF (Associazione italiana agroforestazione)*	Michele Salviato	<a href="mailto:michele@salviato.net">michele@salviato.net</a>
ForestAmica	Claudio Cervellati	<a href="mailto:Claudio.cervellati@coldiretti.it">Claudio.cervellati@coldiretti.it</a>
PEFC Italia	Antonio Brunori	
Accademia di Scienze Forestali	Davide Travaglini	<a href="mailto:davide.travaglini@unifi.it">davide.travaglini@unifi.it</a>
IVALSA Sesto Fiorentino	Carla Nati	<a href="mailto:nati@ivalsa.cnr.it">nati@ivalsa.cnr.it</a>
Unità di Ricerca per le Produzioni Legnose Fuori Foresta	Lorenzo Vietto e Domenico Coaloa Achille Giorcelli	<a href="mailto:lorenzo.vietto@entecra.it">lorenzo.vietto@entecra.it</a> <a href="mailto:domenico.coaloe@entecra.it">domenico.coaloe@entecra.it</a>
Coldiretti – Sez.pioppo	Stefano Loporati	<a href="mailto:Stefano.leporati@coldiretti.it">Stefano.leporati@coldiretti.it</a>
Unprofor	Andrea Montresor	<a href="mailto:info@unprofor.it">info@unprofor.it</a>

## Appendix 2. Responses to Stakeholder Questionnaire

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A total of two responses were received. In terms of a minimum sample size of 30 people, the survey has limited utility. Answers are summarized below; responses are denoted as a) and b).

1. When were you invited to participate to the revision process of PEFC Italy?
  - a. 23/09/2016 [The Consultants note that this was the date the ITS survey was distributed]
  - b. 06/11/2014
2. In your view, was participation and contribution to the scheme development and revision easy, difficult or average?
  - a. Average
  - b. Easy
3. Did the organisers provide you with relevant material to participate in the scheme development and revision?
  - a. Yes
  - b. Yes
4. Was the development and revision process well planned and structured?
  - a. Organized
  - b. Very organized
5. In your view, were your views appropriately considered during the development and revision process?
  - a. Yes
  - b. Yes
6. Was a consensus reached in the development of the certification criteria?
  - a. Yes
  - b. Yes
7. Did the participating stakeholders represent the range of interests in forest management in your country? If not, which other interests groups do you think should have participated?
  - a. Yes
  - b. Yes
8. Do you believe any specific aspects of the scheme deserve further consideration?
  - a. Chain of custody
  - b. No additional considerations

## Appendix 3. PEFC Council Minimum Requirements Checklist

### Part I: Standard and System Requirement Checklist for STANDARD SETTING (PEFC ST 1001:2010)

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
<b>Standardising Body</b>						
4.1 The standardising body shall have written procedures for standard-setting activities describing:						The Assocaizone PEFC Italia (API) has written procedures for standard setting (as documented Standard Revision Setting Process and Working Group Rules (Annex 1, Appendix 1)).
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	Y	Annex 9	Annex 1	2.2.2, App 1 A1	(i)The status of API (Standardising body) (as the owner of PEFC Italy with sole responsibility for approving and formal adoption of API’s PEFC Italia Certification System (PICS)) and structure are described as follows: “2.2.2 PEFC-Italy PEFC-Italy is the association which represents the national governing body of Italy in the PEFC certification scheme. Its composition, its objectives and its function respect the mission established in its own Statutes and in this document. 2.2.2.1 General Assembly In addition to the provisions of the Statutes of Association, the General Assembly of the members: a) instructs the President to begin the process of creation and subsequent revision of the SFM standard, b) instruct the Board of Directors to identify the group of experts (permanent and external) to take care of the periodic review of the SFM standard and identify the three “wise men” of the Group for conflicts resolution

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						<p>that might arise during the course of the Forum for the revision of the SFM standards,</p> <p>c) ratify or modify the decisions of the Board of Directors in relation to the periodic revision of SFM standard.</p> <p>2.2.2.2 President In addition to the provisions of the Statute, the President shall perform the procedures to begin the process of periodic review of the SFM standards; coordinates the work of the Board of Directors and Secretariat for the approval of SFM standard.</p> <p>2.2.2.3 Board of Directors In addition to the provisions of the Statute, the Board of Directors:</p> <p>a) arranges the development, formal adoption and rules modification relating to the SFM certification controls; b) arranges the development, adoption and rules modification relating to the chain of custody for wood products; c) approves the final revision of the national SFM standard proposed by the Group of Expert of the Forum d) draws up contracts with the TA, GR and IN for the usage of PEFC Logo.</p> <p>2.2.2.4 Group of Expert (Forum) A permanent Working Group of external experts (that is a balanced representation of stakeholder categories relevant to forest sector) is delegated by PEFC-Italy Assembly to periodically (at least every five years) review the national SFM Standard, according to formal procedures for standard setting activities recognized by PEFC (see Appendix 1); the final revision will approved by BoD. PEFC Italy will identify disadvantaged and key stakeholders, addressing the constraints of their</p>

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						<p>participation and proactively seeking their participation and contribution in the standard-setting activities. PEFC Italy will 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. In the public announcement there will be:</p> <ul style="list-style-type: none"> <li>a) information about the objectives, scope and the steps of the standard-setting process and its timetable,</li> <li>b) information about opportunities for stakeholders to participate in the process,</li> <li>(c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders will be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,</li> <li>d) an invitation to comment on the scope and the standard-setting process</li> <li>e) reference to publicly available standard-setting procedures.</li> </ul> <p>2.2.2.5 General Secretariat  PEFC-Italy General Secretariat is charged with managing the ordinary and administrative activity of PEFC, with maintaining the institutional relationship with TA and GR, with coordinating the association’s activities and deals with the execution of the association’s resolutions. PEFC-Italy General Secretary manages the Secretariat functions. In particular, it:</p> <ul style="list-style-type: none"> <li>a) Coordinates actors involved in reviewing documents in accordance with PEFC-Italy procedures;</li> </ul>

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						<p>b) Informs the applicants of lists of CBs accredited by ACCREDIA and of list of the CBs, which have applied for accreditation by ACCREDIA;</p> <p>c) Maintains and updates the register of certified single owners/managers (IN), TA and GR;</p> <p>d) Maintains and updates the register of participants in TA and GR certification;</p> <p>e) Maintains and updates the register of PEFC Logo users, and sends the information to the PEFCC;</p> <p>f) Offers assistance to all applicants and involved actors (IN, TA, GR, CB, etc.); and</p> <p>g) Represents the only entity delegated to provide exact (or precise) interpretation of the PEFC Italy scheme regarding questions concerning the scheme and not third party audits. “</p> <p>(ii) The rules for convening the Forum Working Group (FWG) to recommend the Standard to PEFC Italia based on consensus with FWG (Annex 1 Appendix 1 B4 and C3); “Decisions of the Working Group shall require the vote that represents the consensus” (Annex 1 Appendix 1 B4) and “For any irresolvable discussions related to technical issues that did not find a consensus decision, it shall be referred to a ”Panel of experts for conflict resolution”, comprised of three persons appointed by PEFC Italy and Federforeste, that are highly recognized in forestry sector and with knowledge of PEFC forest certification. Its members will be communicated to the Working Group and to the stakeholders in the beginning of the standard revision setting process through a formal publication into the website of PEFC Italy. The decision of this Panel will be definitive for the standard and the final result will be considered by the Working Group.” (Annex 1 Appendix</p>

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						<p>1 B4 and C3)                      The Board of Directors is identified as the body responsible for formal adoption of the standard.                      “2.2.2.3 Board of Directors                      In addition to the provisions of the Statute, the Board of Directors:                      a) arranges the development, formal adoption and rules modification relating to the SFM certification controls;                      b) arranges the development, adoption and rules modification relating to the chain of custody for wood products;                      c) approves the final revision of the national SFM standard proposed by the Group of Expert of the Forum                      d) draws up contracts with the TA, GR and IN for the usage of PEFC Logo.”</p>
b) the record-keeping procedures,	Procedures	Y	Annex 9	Annex 1	App 1 B4	<p>The maintenance by API of records and documentation in relation to standard setting activities for 5 to 7 years (Annex 1 Appendix 1 B5) is held by the FWG;                      “The Working Group shall keep the following records of the standards development process:                      a) List of all consultants or other individuals who have been involved in drafting the standard, together with their affiliations;                      b) List of all stakeholders invited to participate in the standards setting process;                      c) List of all forest stakeholders sent specified drafts of the standard and invited to comment;                      d) All correspondence in relation to development of the standard;                      e) Copies of each draft of the standard which was prepared during the development process;                      f) Copies of all comments submitted in writing with</p>

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						respect to the specified draft standards; and h) Summaries of comments on each draft, together with a brief explanation of the way in which those comments were responded to in the draft. The Working Group shall provide PEFC Italy with a copy of the complete set of records specified above and shall keep a copy of the records for at least seven years.”
c) the procedures for balanced representation of stakeholders,	Procedures	Y	Annex 9	Annex 1	App 1 B5	(iv) The membership of FWG to include a balance of “appropriate interests with no single interest representation can dominate decision making procedures”. The Procedure lists the variety of organisations intended to be represented on FWG (Annex 1 Appendix 1 B1), with representatives from each of: “Forest owners and Consortium, Regional and National government, Trade Unions, Wood processing industry, Environmental organizations, Forestry practitioners and forest workers, Forest consultants organizations, Wood products art craft, Consumers, mixed category (Research organizations, Academy, Standardizing body etc.).”
d) the standard-setting process,	Procedures	Y	Annex 9	Annex 1	App 1 B1	“This is a consolidating document which defines the existing Italian standard setting process and procedures with the Forum Working Group Rule ... The document defines the procedures and process requirements for the revision of the PEFC Italy Standards. “
e) the mechanism for reaching consensus, and	Procedures	Y	Annex 9	Annex 1	App 1 C1 - C3	“C2 Decision to approve the standard: The working group will be responsible of the standard revision. The work of the Forum is organized with the goal to reach the highest level of consensus. According to PEFC Council definition of consensus present in PEFC ST 1003:2010 all decisions shall be based on an evident consensus. Consensus need not imply unanimity but is reached in case of absence of

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						sustained opposition from a relevant part of the forum (10% of Forum components, representing at least two categories). The President and the Secretary shall guarantee that every point of view is taken in consideration to reconcile any possible conflicts. Any single interest can not prevail and none of the participants can ask for a veto. In case of not reaching an agreed text, the Secretary of PEFC will start a process of conflict resolution as described in PEFC ST 1003: 2010.”
f) revision of standards/normative documents.	Procedures	Y	Annex 1	Annex 1	App 1 B1	The Procedure requires API to convene an FWG to “correct and revise Italian SFM standards within five years of its approval” (Annex 1 Appendix 1 B1). The process of revision is also represented in Figure 1 of the document (reproduced as Figure 1 in this document).
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	Y	Annex 9	Annex 1	App 1 B2	<p>“The beginning of the standard setting process and information on the development process shall be communicated publicly and stakeholder representatives shall be notified directly. Key documents including this process document and related documents, the consultation drafts and the formal responses to comments received shall be available to all interested parties by publication on the website and direct notification to stakeholder representatives. Working Group members shall receive all relevant papers and minutes of meeting before the meeting; the results will be available for the participants that shall be responsible for keeping their constituents informed.”</p> <p>API’s practice is to periodically review and update its</p>

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						standard setting procedures as required, and convene a FWG to “correct and revise Italian SFM standards within five years of its approval” (Annex 1). API’s Standard Setting Procedure requires the convening of FWG at a time not exceeding a five year period from the field implementation of last standard revision (Annex 1 Appendix 1 B1).
	Process	Y	Annex 12	Annex 12	12.1, 12.4, 12.6	The API (the standardizing body) makes publicly available the standard setting procedures for PICS (Annex 1) on their Website (Annex 12.1). Links and evidence have been sited. See for example: <a href="http://www.pefc.it/news-a-media/news/426-inizio-del-processo-di-revisione-dello-standard-di-certificazione-forestale-del-pefc-italia">http://www.pefc.it/news-a-media/news/426-inizio-del-processo-di-revisione-dello-standard-di-certificazione-forestale-del-pefc-italia</a> . Comments from stakeholders have been taken into account from Monica Guglini of ERSAF (Annex 12.6), for example.
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	Procedures	Y	Annex 9	Annex 1	App 1 B5	Procedures: “The records are kept for a minimum of five years and shall be available to interested parties upon request.” (Annex 1, 6.1.3) Specifically, the API requires the FWG to keep records of the standard development (Annex 1 Appendix 1 B5) and that these records are provided to API and must be maintained for seven years.

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
a minimum of five years and shall be available to interested parties upon request.	Process	Y	PEFC Italy website: <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015</a> Annex 12	Annex 12	12.5	The PEFC Italy website reference provided contains a large number of documents that record the process undertaken to comply with the procedures, including meeting minutes and drafting changes. Evidence for these processes in the form of meeting minutes has also been provided in Annex 12. 5
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	Procedures	Y	Annex 9	Annex 1	Appendix 1 B1 Annex 1 6.1.4	The API established the FWG to review the Standard (Annex 1 Appendix 1 B1). The FWG is required to: a) Be accessible to stakeholders (Annex 1 Appendix 1 B1); b) Have balanced representation and decision making of appropriate interests relevant to the subject matter and geographical scope of the standard (stakeholder categories -- Forest owners and Consortium, Regional and National government, Trade Unions, Wood processing industry, Environmental organizations, Forestry practitioners and forest workers, Forest consultants organizations, Wood products art craft, Consumers, mixed category (Research organizations, Academy, Standardizing body etc.) Annex 1 Appendix 1 B1) and that “no single category of the interest representation can dominate decision making procedures” of AWG (Annex 1 6.1.4); c) Include, but not be limited to, interest categories representing Forest owners and Consortium, Regional and National government, Trade Unions, Wood processing industry, Environmental organizations, Forestry practitioners and forest workers, Forest consultants

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						organizations, Wood products art craft, Consumers, mixed category (Research organizations, Academy, Standardizing body etc.) Annex 1 Appendix 1 B1). These interest categories have expertise relevant to forest management standards for PEFC Italy, and are materially affected by Standard and influence implementation of Standard.
	Process	Y	Annex 12	Annex 12.3	Email communication with forum members	The documentation presented by API to support re-endorsement of PICS demonstrates that the above requirements were met in practice. The documentation includes: <ul style="list-style-type: none"> <li>- Public announcements regarding the establishment of the revision process;</li> <li>- A documented list of the group members (Annex 1 Appendix 2)</li> <li>- Records of communication with the Group members (Annex 12.3)</li> </ul>
4.4 The working group/committee shall:						
a) be accessible to materially and directly affected stakeholders,	Procedures	Y	The WG is represented by all the stakeholders	Annex 1	App 1 B1	The API established the FWG to review the Standard (Annex 1 Appendix 1 B1). The FWG is required to: “a) Be accessible to stakeholders (Annex 1 Appendix 1 B1);”
	Process	Y	Annex 12	Annex 12	Annex 12.1 Annex 12.2	The Working Group was made accessible to affected stakeholders via a number of announcements made via Federforeste and the PEFC Italy websites requesting participating (Annex 12.1). Email invitations to s
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	Procedures	Y	Annex 1 – Appendix 1	Annex 1	App 1 B1 6.1.4	The FWG is required to: “Have balanced representation and decision making of appropriate interests relevant to the subject matter and geographical scope of the standard (stakeholder categories -- Forest owners and Consortium, Regional and National government, Trade Unions, Wood processing industry, Environmental

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
process, and						organizations, Forestry practitioners and forest workers, Forest consultants organizations, Wood products art craft, Consumers, mixed category (Research organizations, Academy, Standardizing body etc.)” (Annex 1 Appendix 1 B1) and that “no single category of the interest representation can dominate decision making procedures” of AWG (Annex 1 6.1.4);
	Process	Y	Annex 12.5	Annex 1 Annex 9	P27 P7	A list of forum participants/members has been provided. The membership is distributed between: regional public forest representatives (5), private forest owner consortia (5), civil society (3), consultants (3), environmental groups (3), practitioners /workers (3), processors (2), trade unions (2), research organisations (2), multilateral organisations (1), and PEFC Italy.
c) include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.	Procedures	Y	Annex 1 – Appendix 1	Annex 1	App 1 B1	The FWG is required to: c) Include, but not be limited to, interest categories representing Forest owners and Consortium, Regional and National government, Trade Unions, Wood processing industry, Environmental organizations, Forestry practitioners and forest workers, Forest consultants organizations, Wood products art craft, Consumers, mixed category (Research organizations, Academy, Standardizing body etc.) Annex 1 Appendix 1 B1). These interest categories have expertise relevant to forest management standards for PEFC Italy, and are materially affected by Standard and influence implementation of Standard.
	Process	Y	Annex 12.5	Annex 9	P7	The expertise of the representatives identified have relevant subject matter expertise (research organisations, consultants, standardising bodies), will be materially affected by the standard (forest workers and practitioners, environmental groups, forest owners, processors and industry, civil society/consumer groups)

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						and can influence the implementation of the standard (regional public and private forest owner groups, practitioners, standardising body, environmental groups). The materially affected representation is meaningful in that they represent the all parts of the supply chain and all elements impacted by standard implementation, i.e. social, environmental and economic.
4.5 The standardising body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders.	Procedures	Y	Annex 1 – Appendix 1	Annex 1	App 1 C3	Procedures: "The records are kept for a minimum of five years and shall be available to interested parties upon request." (Annex 1, 6.1.3) Specifically, the API requires the FWG to keep records of the standard development (Annex 1 Appendix 1 B5) and that these records are provided to API and must be maintained for seven years.
	Process	Y	Annex 12			Evidence for these process in provided in Annex 12.
4.5 Upon receipt of the complaint, the standard-setting body shall:						
a) acknowledge receipt of the complaint to the complainant,	Procedures	Y	Annex 1 – Appendix 1 – C3	Annex 1	App 1 C3 and 6.1.5	6.1.5 "Upon receipt of the complaint, PEFC Italy will: (a) acknowledge receipt of the complaint to the complainant"
	Process	Y	Annex 12			The documentation presented by API to support re-endorsement of PICS demonstrates that the above requirements were met in practice (Annex 12.5).
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	Y	Annex 1 – Appendix 1 – C3	Annex 1	App 1 C3 and 6.1.5	6.1.5 "(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"
	Process	Y	Annex 12			The documentation presented by API to support re-endorsement of PICS demonstrates that the above requirements were met in practice (Annex 12.5).
c) formally communicate the decision on	Procedures	Y	Annex 1 –	Annex 1	App 1 C3 and	6.1.5 "(c) formally communicate the decision on the

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
the complaint and of the complaint handling process to the complainant.			Appendix 1 – C3		6.1.5	complaint and of the complaint handling process to the complainant."
	Process	Y	Annex 12			The documentation presented by API to support re-endorsement of PICS demonstrates that the above requirements were met in practice (Annex 12.5).
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	Y	In all communication PEFC Italy Secretary General is identified as focal point	Annex 1	5	All communications, including complaints and appeals are to be addressed in writing to the API Secretary General (Annex 1: 5).
<b>Standard-setting process</b>						
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	Y	Annex 1 – Appendix 1 – B1	Annex 1	App 1 B1	API (the standardizing body) is required to establish the FWG, which is a “permanent Working Group of external experts (that is a balanced representation of stakeholder categories relevant to forest sector) ... to periodically (at least every five years) review the national SFM Standard, according to formal procedures for standard setting activities recognized by PEFC.” (Annex 1 2.2.2.4)
	Process	Y	Annex 12	Annex 12	12.2	The FWG’s constitution represents such a cross section of stakeholders. In its application API has provided evidence that invitations were distributed to a representative cross section of stakeholders. A reproduction of the list of stakeholders is reproduced on page 19 of this report.
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	Procedures	Y	Annex 1 – Appendix 1 – B1	Annex 1	App 1 B1 and 6.2.2	The API Standard Setting Procedures require that key stakeholders are identified and invited to participate in the FWG: “Are considered disadvantaged stakeholders those that cannot participate because of financial problems, lack of transportation facilities or lack of

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
contribution in the standard-setting activities.						informatics tools for the exchange of the standard revision documentation, while key stakeholders are those organizations that strongly influence the revision process because of their relevance in the Forest and related sectors.” (Annex 1 Appendix 1 B1) API is required to “to assure that 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.” (Annex 1 Appendix 1 B1) This is also reiterated at 2.2.2.4, 6.2.2, 6.2.3 and 6.2.6
	Process	Y	Annex 12	Annex 12	12.3	There is evidence that disadvantaged stakeholders are clearly identified in Annex 9 through the use of two distinct categories of stakeholders, denoted by ‘(S)’, which denotes ‘svantaggio’. Evidence for this is provided in Annex 9 3.4; this also required clarification from PEFC Italy. Disadvantaged stakeholders were contacted via telephone and email to address their participation constraints (Annex 12.3); the stakeholders’ status as disadvantaged or otherwise has been denoted.
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	Y	Annex 1 2.2.2.4	Annex 1	2.2.2.4	The PEFC Italy procedures require that it “will 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.” (Annex 1 2.2.2.4).
	Process	Y	Annex 12.1			The process implemented by FWG for revision of Standards for Sustainability for Forest Certification

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						<p>included:</p> <ul style="list-style-type: none"> <li>• July 25 2014 API announced notification of the convening of FWG via its website;</li> <li>• November 10 2014, FWG and API sent an email to 396 email contacts, announcing the commencement of the process and inviting members. The invitation was to a ‘SkyMeeting’ announced the convening of the FWG</li> <li>• The announcement contained references to the scope and the standard setting process;</li> <li>• A 60-day Pre-Revision public consultation was announced on July 2 2015 via the website. The notification announced the objectives and scope of the consultation, and outlined several means by which comments could be submitted (email, fax, and mail).</li> <li>• The announcement for the revised (draft) <i>Standards</i> was distributed via press release and e-newsletter contact lists, as well as through API Website and professional media distribution services. The announcement included information about opportunities for stakeholders to participate in the consultation process (Annex 12.1).</li> </ul> <p>The documentation provides information on opportunities for stakeholders to participate including via a SkyMeeting ‘virtual meeting’ process and information</p>

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						on the objectives, scope and steps in process and timetable.
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	Y	Annex 1 2.2.2.4	Annex 1	2.2.2.4	“The Standard Setting Procedures specify that the announcement will contain: a) information about the objectives, scope and the steps of the standard-setting process and its timetable,”
	Process	Y	Annex 12.1		Links 1 - 6	API has provided evidence that the processes are consistent with the requirement in Annex 12.1 comprising objectives, scope and timetabling in the form of web announcements and invitations
b) information about opportunities for stakeholders to participate in the process,	Procedures	Y	Annex 1 2.2.2.4	Annex 1	2.2.2.4	“The Standard Setting Procedures specify that the announcement will contain: b) information about opportunities for stakeholders to participate in the process,”
	Process	Y	Annex 12.1		Links 1 - 6	The web announcements and emails provided information on these opportunities.
(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	Y	Annex 1 2.2.2.4	Annex 1	2.2.2.4	“The Standard Setting Procedures specify that the announcement will contain: c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders will be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,
	Process	Y	Annex 12.1		Links 1 - 6	API has provided evidence that the processes are consistent with the requirement in Annex 12.1

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
d) an invitation to comment on the scope and the standard-setting process, and	Procedures	Y	Annex 1 2.2.2.4	Annex 1	2.2.2.4	“The Standard Setting Procedures specify that the announcement will contain: d) an invitation to comment on the scope and the standard-setting process and
	Process	Y	Annex 12.1		Links 1 - 6	API has provided evidence that the processes are consistent with the requirement in Annex 12.1
e) reference to publicly available standard-setting procedures.	Procedures	Y	Annex 1 2.2.2.4	Annex 1	2.2.2.4	“The Standard Setting Procedures specify that the announcement will contain: e) reference to publicly available standard-setting procedures.
	Process	Y	Annex 12.1		Links 1 - 6	API has provided evidence that the processes are consistent with the requirement in Annex 12.1
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	Y	Annex 1 6.1	Annex 1	6.2.4	The text is consistent with the requirement, stating “PEFC Italy reviews the standard-setting process based on comments received from the public announcement and establishes a working group/committee or adjusts the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations will be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting.”
	Process	Y	Annex 12.3			The API convened the FWG (announced on November 6, 2014 and operating over 2014/2015) to develop and recommend a revised Standard (Annex 12.3).  The FWG reviewed the 175 sets of comments received from consultations with the FWG in this period.

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						associated with revision of Standard. The FWG agreed on and finalized a revised Standard at meetings on April 22 2015 and June 28 2015 (Annex 12.5).
5.5 The work of the working group/committee shall be organised in an open and transparent manner where:						
a) working drafts shall be available to all members of the working group/committee,	Procedures	Y	Annex 1 6.2.5	Annex 1	6.2.5	API’s Standard Setting Procedures require the FWG to undertake their responsibilities in open and transparent manner and freely exchange information (Annex 1 6.2.5); the text mirrors the requirement: “The work of the working group/committee will be organised in an open and transparent manner where: “(a) working drafts shall be available to all members of the working group/committee,”
	Process	Y	Annex 12 PEFC Italy website: <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015</a>			Minutes of meetings of FWG (Annex 12.5) support the outcomes of: <ul style="list-style-type: none"> <li>a) members of FWG actively participating in revision processes and having ready access to working drafts; and</li> <li>b) members of FWG being provided with opportunities to make meaningful comments in re-drafting processes;</li> <li>c) comments by FWG members were considered by other members in open and transparent way and proposed changes in Standard recorded.</li> </ul>
b) all members of the working group shall be provided with meaningful opportunities to contribute to the	Procedures	Y	Annex 1 6.2.5	Annex 1	6.2.5	The text is consistent with the requirement; “(b) all members of the working group shall be provided with meaningful opportunities to contribute to the

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
development or revision of the standard and submit comments to the working drafts, and	Process	Y	Annex 12 PEFC Italy website: <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015</a>		e.g. <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015/materiali-di-approfondimento-e-lavori-del-forum">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015/materiali-di-approfondimento-e-lavori-del-forum</a>	development or revision of the standard and submit comments to the working drafts,” Minutes of meetings of FWG (Annex 12.5) support the outcomes of members of FWG being provided with opportunities to make meaningful comments in re-drafting processes.
	Procedures	Y	Annex 1 6.2.5	Annex 1	6.2.5	The text is consistent with the requirement, and states “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.”
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.	Process	Y	Annex 12 PEFC Italy website: <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015</a>		See e.g. <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015/materiali-di-approfondimento-e-lavori-del-forum">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015/materiali-di-approfondimento-e-lavori-del-forum</a>	Minutes of meetings of FWG (Annex 12.5) support the outcomes of: comments by FWG members were considered by other members in open and transparent way and proposed changes in Standard recorded.
5.6 The standardising body shall organise						

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
a public consultation on the enquiry draft and shall ensure that:						
a) the start and the end of the public consultation is announced in a timely manner in suitable media,	Procedures	Y	Annex 1 6.2.6	Annex 1	6.2.6	The API Standard Setting Procedure requires the enquiry Standard, upon consensus of FWG be made available for public review and comment (Annex 6.2.6), and the API “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.” (Annex 1 6.2.6).
	Process	Y	Annex 12.1 Annex 12.5 Annex 12.6	Annex 12.1	<a href="http://www.aalsea.it/notizie/87-consultazione-pubblica-pefc-per-arboricoltura-da-legno.html">http://www.aalsea.it/notizie/87-consultazione-pubblica-pefc-per-arboricoltura-da-legno.html</a> and <a href="http://www.ecodelleforeste.it/inizia-la-consultazione-pubblica-degli-standard-di-certificazione-forestale-del-pefc-italia/">http://www.ecodelleforeste.it/inizia-la-consultazione-pubblica-degli-standard-di-certificazione-forestale-del-pefc-italia/</a>	In the context of developing the <i>standard</i> the API announced the start and end of public consultation period via the PEFC Italy website, and via two other websites, Eco Della Foreste and (Annex 12.1, 12.5, 12,6) AALSEA

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
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	Y	Annex 1 6.2.6	Annex 1	6.2.6	API Standard Setting Procedures provide for all interested parties which cannot participate in the FWG due to their own or access to API’s financial or staffing resources have opportunity to provide their views and comments through FWG members or through public consultation process (Annex 1 Appendix 1 B1).
	Process	Y	Annex 12.1 Annex 12.5 Annex 12.6	Annex 12.1	<a href="http://www.alsea.it/notizie/87-consultazione-pubblica-pefc-per-arboricoltura-da-legno.html">http://www.alsea.it/notizie/87-consultazione-pubblica-pefc-per-arboricoltura-da-legno.html</a> and <a href="http://www.ecodelleforeste.it/inizia-la-consultazione-pubblica-degli-standard-di-certificazione-forestale-del-pefc-italia/">http://www.ecodelleforeste.it/inizia-la-consultazione-pubblica-degli-standard-di-certificazione-forestale-del-pefc-italia/</a>	In the context of developing the <i>Standard</i> , system documentation supports a judgment that information reached key stakeholders and was understandable (for example, API’s provision of an easily accessible web form using the Google Docs platform at <a href="https://docs.google.com/forms/d/1n-MZYF0K8eT5L_IHyWEX1wCLSiX9spY17jROOB3XBeo/viewform">https://docs.google.com/forms/d/1n-MZYF0K8eT5L_IHyWEX1wCLSiX9spY17jROOB3XBeo/viewform</a> )
c) the enquiry draft is publicly available and accessible,	Procedures	Y	Annex 1 6.2.6	Annex 1	6.2.6	API Standard Setting Procedures require the API to make available for public review and comment, upon consensus of FWG, the draft (enquiry) Standard (Annex 1 6.2.6).

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
	Process	Y	Annex 12.1 Annex 12.5 Annex 12.6		See: <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015/standard-con-modifiche-dopo-il-lavoro-del-forum">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015/standard-con-modifiche-dopo-il-lavoro-del-forum</a>	The enquiry standard for the Standard was made publicly available on July 2, 2015 via website announcements (PEFC Italy, AALSEA and Federforeste) (Annex 12.1)
d) the public consultation is for at least 60 days,	Procedures	Y	Annex 1 6.2.6	Annex 1	6.2.6	API Standard Setting Procedures require for the enquiry draft the “the public consultation is for at least 60 days,” (Annex 1 6.2.6).
	Process	Y	Annex 12.1 Annex 12.5 Annex 12.6	Annex 12.1	Links 1 to 5	In the development of the <i>Standard</i> the public consultation period was July 2 to August 17 2015 (Annex 12.1).
e) all comments received are considered by the working group/committee in an objective manner,	Procedures	Y	Annex 1 6.2.6	Annex 1	6.2.6	API’s Standard Setting Procedures require any presented comments shall be reviewed and considered by FWG in an open and transparent manner (Annex 1 6.2.6). “e) all comments received are considered by the working group/committee in an objective manner,”

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
	Process	Y	Annex 12.1 Annex 12.5 Annex 12.6	Annex 12.1	One comment was received during the consultation	The comment(s) received was considered, (Annex 12.6). That it was considered by the entire working group gives an indication that it was considered objectively.
(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	Y	Annex 1 6.2.6	Annex 1	6.2.6	API’s Standard Setting Procedures require the comments, responses received, and relevant modifications to (enquiry Standard) shall be made available to Commentators and public upon request or from API’s Website”: “a synopsis of received comments, including the results of their consideration, is publicly available, for example on PEFC Italy website.”
	Process	Y	Annex 12.1 Annex 12.5 Annex 12.6	Annex 12.1	<a href="http://www.pefc.it/images/stories/Documents/Forum_2015/Risultati_della_Consultazione_publica.pdf">http://www.pefc.it/images/stories/Documents/Forum_2015/Risultati_della_Consultazione_publica.pdf</a>	The minutes of meeting of the FWG incorporating FWG deliberations on issues raised during public consultation process were available on API website in practice (Annex 12.1).
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.	Procedures	Y	Pilot testing is not required in case of revision of a standard where experience from its usage can substitute for pilot testing	NA		API’s Standard Setting Procedure provides an option for API to pilot test any revisions or modifications to Standard (Annex 1 6.2.7). No pilot testing was undertaken of the Standard. The consultants acknowledge that the 2015 Standard: <ul style="list-style-type: none"> <li>was subject to two revision processes (a Pre-Revision Public Consultation Period and enquiry draft stakeholder consultation); and</li> <li>incorporates the lessons learnt (experiences)</li> </ul>

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
						from application of the Standard over time. PEFC note that “pilot testing is not required in case of revision of a standard where experience from its usage can substitute for pilot testing”. On this basis the consultants deem the API’s judgment not to conduct pilot testing as reasonable, and complying with PEFC requirements.
	Process	Y				Not applicable (see above)
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	Y	Annex 1 6.2.8	Annex 1	6.2.8	API’s Standard Setting Procedures require the FWG to provide evidence to API that they have reached consensus (Annex 1 6.2.8) by utilizing the processes detailed in Annex 1 Appendix 1 C3 before API formally approve Standard. “The decision of the working group to recommend the final draft for formal approval will be taken on the basis of a consensus.”
	Process	Y	Annex 12.5			The FWG for the Standard demonstrates consensus through meeting minutes for revisions (Annex 12.5). This is further demonstrated by clear communications from PEFC Italy expressly asking for a decision on the final document, to which responses (positive) were received.
5.8 In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition: a) a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a	Procedures	Y	Annex 1 6.2.8	Annex 1	6.2.8	“In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition: a) a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,  API’s Standard Setting Procedures require the FWG in the

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
formal balloting process, etc.,						case of “a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue” to utilize the mechanisms specified by PEFC requirements (Annex 1 6.2.8 (a to d)).
	Process	Y	Annex 12			In the context of revising the Standard objections did not arise. See below for the means to establish opposition.
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures	Y	Annex 1 6.2.8	Annex 1	6.2.8	“b) a web-conference meeting where there is a verbal yes/no vote,”
	Process	Y	Annex 12			Not utilised
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	Y	Annex 1 6.2.8	Annex 1	6.2.8	” 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),
	Process	Y	Annex 12			API has provided evidence of the meeting in Annex 12, where PEFC Italy established a request via email for consensus or objections. “Standard di GFS e GSA: conclusione dei lavori del Forum”
d) combinations thereof.	Procedures	Y	Annex 1 6.2.8	Annex 1	6.2.8	or d) combinations thereof.
	Process	Y	Annex 12			See above.
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):						“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 will be resolved using the following mechanism(s):”

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,	Procedures	Y	Annex 1 6.2.9	Annex 1	6.2.9	“(a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,”
	Process	Y	Annex 12	Annex 9	4	API has provided meeting minutes and working versions of the draft standard and have provided a compilation of the process. There was no sustained opposition; differences in opinion on drafting were negotiated through the process itself. A
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	Y	Annex 1 6.2.9	Annex 1	6.2.9	“(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,”
	Process	Y	Annex 12	Annex 9	4	
c) dispute resolution process.	Procedures	Y	Annex 1 6.2.9	Annex 1	6.2.9	“(c) dispute resolution process.”
	Process	Y	Annex 12	Annex 9	4	
5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.	Procedures	Y	Annex 1 6.2.9	Annex 1	6.2.10	API’s Standard Setting Procedures require documentation on implementation of standard setting processes to be made publicly available (Annex 1 6.2.10). “Documentation on the implementation of the standard-setting process will be made publicly available.”
	Process	Y	PEFC Italy website: <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015</a>	Correct reference		During the development of Standard the API made publicly available (via website and emails) documentation on implementation of standard setting at the link provided (see left). .

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	Procedures	Y	Annex 1 6.2.11	Annex 1	6.2.11	requirement” “The standardising body will formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.”
	Process	Y	Annex 12	Annex 12.4	All	API has provided evidence that consensus was reached by the FWG via a lengthy process in Annex 12. This includes meeting minutes, notes and working drafts (Annex 12.4). The final formal approval of the Standard by the Board of Directors was based on this process. The meeting took place on October 28 2015 and has been recorded via email correspondence. (Annex 12.3)
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Procedures	Y	Annex 1 6.2.11	Annex 1	6.2.12	”The formally approved standards/normative documents will be published in a timely manner and made publicly available.”
	Process	Y	PEFC Italy website: <a href="http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015">http://www.pefc.it/documenti/forum-gestione-forestale-sostenibile-2015</a>	Correct reference		The evidence provided indicates that the requirement was met; the link provided by the Applicant indicates that the Standard was published, was publicly available and done so within a timely manner.
<b>Revisions of standards/normative documents</b>						

Question	Assess. basis*	YES /NO*	Reference in application documents	Consultant Reference Document	Reference	Text and/or consultant analysis
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	Y	Annex 1 6.3.1	Annex 9	Annex 9, p. 6	The revision process commenced on May 9 2014 (Annex 9); the previous revision was completed in January 2010. The procedures for revision are described in Figure 1 (Annex 1, p 21). The procedures for revision follow the standard-setting process set out in Chapter 5 by repeating the process.
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	Process	Y	Annex 1 6.3.2	Annex 1	App 1 'Effective Date'	The 'effective date' defined is 17 April 2015. The transition date is defined as "The period of transition for the implementation of the changes to the scheme will last 12 months from the moment in which the scheme is approved by PEFC Council, for all the new certifications and for renewals."
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	Y	Annex 1 6.3.3	Annex 1	See Annex 9.	The standard was published on November 2015 as described in Annex 9 and on the PEFC Italy website. The application date was May 31 2016.
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	Y	Annex 1 6.3.4	Annex 1	2.1 'Description'	"The period of transition for the implementation of the changes to the scheme will last 12 months from the moment in which the scheme is approved by PEFC Council, for all the new certifications and for renewals."

**PART II: Standard and System Requirement Checklist for Group FOREST MANAGEMENT CERTIFICATION (PEFC ST 1002:2010)**

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
<b>General</b>					
4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:					
a) the group organisation,	Y	Annex 1 1.3.1	Annex 1	1.3.1	" A group of participants represented by the group entity for the purposes of implementation of the sustainable forest management standard and its certification."
b) the group entity,	Y	Annex 1 1.3.1	Annex 1	1.3.1	" 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."
c) the participant,	Y	Annex 1 1.3.1	Annex 1	1.3.1	" A forest owner/manager or other entity covered by the individual forest certificate or by the group forest certificate, who has the legal right to manage the forest in a clearly defined forest area"
d) the certified area,	Y	Annex 1 1.3.1	Annex 1	1.3.1	" The forest area covered by the individual forest certificate or by a group forest certificate representing the sum of forest areas of the participants."
e) the group forest certificate, and	Y	Annex 1 1.3.1	Annex 1	1.3.1	" A document confirming that the group organisation complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certification scheme.);"

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
f) the document confirming participation in group forest certification.	Y	Annex 1 1.3.1	Annex 1	1.3.1	"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."
4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner.	Y	Annex 1 2.2.1.1.	Annex 1	2.2.1.1 (p)	" When participant is covered by additional group or individual forest management certifications, ensure that NC by the participant identified under one forest management certification scheme is addressed in any other forest management certification scheme that covers the participant."
		Annex 1 2.2.1.2	Annex 1	2.2.1.2 (p)	" When participant is covered by additional group or individual forest management certifications, ensure that NC by the participant identified under one forest management certification scheme is addressed in any other forest management certification scheme that covers the participant"

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
<p>4.1.3 The forest certification scheme shall define requirements for group forest certification which ensure that participants' conformity with the sustainable forest management standard is centrally administered and is subject to central review and that all participants shall be subject to the internal monitoring programme.</p>	<p>Y</p>	<p>Annex 1 2.2.1.1</p>	<p>Annex 1</p>	<p>2.2.1.1 (a)(b)(h)(k)</p>	<p>Fulfils requirement: The TA must "(a) represent the group participants 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; (b) Provide a commitment on behalf of the whole group participants to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme; (h) Organize an annual internal monitoring programme on TA participants and collaborate in the audits run by the CB; (k) Gather and accept the individual assent applications of the participants, which are accompanied by an obligation to comply with the PEFC-Italy sustainable forest management standard and other applicable requirements of the PEFC-Italy forest certification scheme;</p>
		<p>Annex 1 2.2.1.2</p>	<p>Annex 1</p>	<p>2.2.1.2 (a)(b)(h)(k)</p>	<p>Fulfils requirement: The GR must "(a) represent the group participants 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; (b) Provide a commitment on behalf of the whole group participants to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme; (h) Organize an annual internal monitoring programme on TA participants and collaborate in the audits run by the CB; (k) Gather and accept the individual assent applications of the participants, which are accompanied by an obligation to comply with the PEFC-Italy sustainable forest management standard and other applicable requirements of the PEFC-Italy forest certification scheme;</p>

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.	Y	Annex 1 2.2.1.1	Annex 1	2.1.1.1 (h)	TAs must ... (h) Organize an annual internal monitoring programme on Group participants ...
		Annex 1 2.2.1.2	Annex 1	2.1.1.2 (h)	GRs must ... (h) Organize an annual internal monitoring programme on Group participants ...
<b>Functions and responsibilities of the group entity</b>					
4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:					
<b>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;</b>	Y	Annex 1 2.2.1.1	Annex 1	2.2.1.1 (a)	“TA’s must: a) Represent the group participants 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”;
		Annex 1		2.2.1.2 (a)	“GRs must: Represent the group participants in the certification

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
		2.2.1.2			process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;”
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;	Y	Annex 1 2.2.1.1.		2.2.1.1 (b)	”Provide a commitment on behalf of the whole group participants to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme”
		Annex 1 2.2.1.2		2.2.1.2 (b)	” Provide a commitment on behalf of the whole group participants to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme”
c) To establish written procedures for the management of the group organisation;	Y	Annex 1 2.2.1.1.		2.2.1.1 (e)	”Produce a SFM handbook in which the requirements for implementation of the whole group organisation with the sustainable forest management standard are elaborated
		2.2.1.2		2.2.1.2 (e)	”Produce a SFM handbook in which the requirements for implementation of the whole group organisation with the sustainable forest management standard are elaborated
d) To keep records of:	Y	Annex 1			

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
- 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;		2.2.1.1.		2.2.1.1 (I)	"Keep and update records (names, land register's location and concerned/certified areas) of TA and participants to the certification, and periodically send it to the CB; each new participant to the TA certification will be included in the TA certification only after the CB's surveillance audit;
		2.2.1.2		2.2.1.2 (I)	"Keep and update records (names, land register's location and concerned/certified areas) of TA and participants to the certification, and periodically send it to the CB; each new participant to the TA certification will be included in the TA certification only after the CB's surveillance audit;

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
<p>e) To establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the sustainable forest management standard;</p>	Y	Annex 1	Annex 1	2.2.1.1.	“(k) Draw up, update and maintain the individual assent applications of the owners, which are accompanied by an obligation deed to the PEFC Italian scheme requirements;
			Annex 1	2.2.1.2	“(k) Draw up, update and maintain the individual assent applications of the owners, which are accompanied by an obligation deed to the PEFC Italian scheme requirements;
<p>f) To provide participants with a document confirming participation in the group forest certification;</p>	Y	Annex 1 2.2.1.1.	Annex 1	2.2.1.1.	“(n) Issue the owner a “group certification assent” certificate, which contains the number and expiry of the group certificate’s validity, the vital information regarding the GR who obtained the certificate, and about the CB who issued it are indicated;
			2.2.1.2	Annex 1	2.2.1.2

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
					about the CB who issued it are indicated;
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;	Y	Annex 1 2.2.1.1.	Annex 1	2.2.1.1.	“(e) Produce a SFM handbook in which the requirements for implementation of the whole group organisation with the sustainable forest management standard are elaborated (see point § 3.2); in the case of CoC certification, produce a CoC Disciplinary/Procedure Manual which contains all the necessary information to reconstruct the passage of woody products coming from forests whose sustainable management has been certified in accordance with the requirements of the PEFC Italian scheme for SFM;
		2.2.1.2	Annex 1	2.2.1.2	“(e) Produce a SFM handbook in which the requirements for implementation of the whole group organisation with the sustainable forest management standard are elaborated (see point § 3.2); in the case of CoC certification, produce a CoC Disciplinary/Procedure Manual which contains all the necessary information to reconstruct the passage of woody products coming from forests whose sustainable management has been certified in accordance with the requirements of the PEFC Italian scheme for SFM;
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements, and;	Y	Annex 1 2.2.1.1.	Annex 1	2.2.1.1.	“(h) Organize an annual internal monitoring programme on TA participants and collaborate in the audits run by the CB;
		2.2.1.2	Annex 1	2.2.1.2	“(h) Organize an annual internal monitoring programme on TA participants and collaborate in the audits run by the CB;

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
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.	Y	Annex 1 2.2.1.1.	Annex 1	2.2.1.1.	(t) and (u) Both TAs and GRs are required to organise meetings with ‘interested parties’ as well as with the participation of the CB on an annual basis. The objective of the meeting—also referred to as a public consultation – is to gather information on all aspects of certification that are considered relevant. The Standard also requires TAs and GRs to make available information regarding the audit activity and compliance.
		2.2.1.2	Annex 1	2.2.1.2	(s) (t) Both TAs and GRs are required to organise meetings with ‘interested parties’ as well as with the participation of the CB on an annual basis. The objective of the meeting—also referred to as a public consultation – is to gather information on all aspects of certification that are considered relevant. The Standard also requires TAs and GRs to make available information regarding the audit activity and compliance.
<b>Function and responsibilities of participants</b>					
4.3.1 The forest certification scheme shall define the following requirements for the participants:					

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
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;	Y	Annex 1 2.2.1.1.1	Annex 1	2.2.1.1.1	“(c) Indicate to the TA, in written form, the forest areas under management and which of these are candidates for certification; all the areas owned/managed within the “region” must go through the certification process, in their entirety, if these woods are amalgamated productive units;
		2.2.1.2.1	Annex 1	2.2.1.2.1	“(c) Indicate to the TA, in written form, the forest areas under management and which of these are candidates for certification; all the areas owned/managed within the “region” must go through the certification process, in their entirety, if these woods are amalgamated productive units; d) Conform to the requirements imposed by the PEFC-Italy certification scheme;
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	Y	Annex 1 2.2.1.1.1	Annex 1	2.2.1.1.1	“(d) Conform to the requirements imposed by the PEFC-Italy certification scheme;
		2.2.1.2.1	Annex 1	2.2.1.2.1	“(d) Conform to the requirements imposed by the PEFC-Italy certification scheme;
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;	Y	Annex 1 2.2.1.1.1	Annex 1	2.2.1.1.1	“(j) Provide full co-operation and assistance in responding effectively to all requests from the TA or CB 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;

Question	YES / NO*	Reference to system documentation	Consultant reference document	Reference	Analysis or text
		2.2.1.2.1	Annex 1	2.2.1.2.1	“(j) Provide full co-operation and assistance in responding effectively to all requests from the TA or CB 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;
d) To implement relevant corrective and preventive actions established by the group entity.	Y	Annex 1 2.2.1.1.1	Annex 1	2.2.1.1.1	“(k) Implement relevant corrective and preventive actions established by the TA.
		2.2.1.2.1	Annex 1	2.2.1.2.1	“(k) Implement relevant corrective and preventive actions established by the TA.

**PART III: Standard and System Requirement Checklist for SUSTAINABLE FOREST MANAGEMENT (PEFC ST 1003:2010)**

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall				
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.	Y	SFM	Annex 1 – 2.2.1 (2.2.1.1 e – 2.2.1.2 e – 2.2.1.3 g)	The standard includes management and performance requirements that are applicable at the national and regional level. The standard includes definitions for parcels of land under group of territorial (sub regional) level that have the intent of achieving SFM at the FMU level.
b) be clear, objective-based and auditable.	Y		Each normative requirement has measurable threshold - See Annex 1, 2 4, 5	The standards are clearly written, objective and auditable by accredited Certification Bodies. (See
c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.	Y		Annex 1 – 2.2.1 (2.2.1.1.1 e – 2.2.1.2.1 e – 2.2.1.3 f)	The Standard applies to the activities of all operators in the certified area that have measurable impact on the environment
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.	Y		Annex 1 3.1 (and following)	The Standard requires the applicant to keep and maintain documentation that includes "managerial procedures, operating instructions and recording forms for the activities already implemented." GL 1.3 "Management plans or their equivalent appropriate to the size and use of the forest area must be written and periodically updated."
<b>Specific requirements for SFM standards</b>				
<b>Criterion 1: Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle</b>				
5.1.1 Forest management planning shall aim to maintain or 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	Y	SFM	I 1.1 a I 1.1 b	Management "must safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by favouring techniques that minimise direct or indirect damage to forest, soil or water resources. Appropriate silvicultural measures must be taken to maintain the growing stock of resources at - or to reach - a level that is economically, ecologically

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
tools that support land-use planning and nature conservation.		SPM	I 1a planning	<p>and socially desirable.” The Standard requires forest management practices to “safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by favouring techniques that minimise direct or indirect damage to forest, soil or water resources.”</p> <p>Management plans are required to clearly state the landowner’s objectives, desirable forest condition and include management activities aimed at reaching desired forest condition. ... Forest owners are required to complete timely restocking of desired species of trees on harvested sites, unstocked areas when consistent with land use practices and forest owner’s management objectives.... Forest owners are required to make reasonable effort to locate and protect special sites.”</p> <p>Landowners are “encouraged” to utilize resource professionals and apply current state of knowledge about forestry and natural resource management.</p> <p>“Forest management planning should aim to maintain or increase forest and other wooded area, and enhance the quality of the economic, ecological, cultural and social values of forest resources, including soil and water. This should be done by making full use of related services such as land-use planning and nature conservation. The owner/manager must:</p> <ul style="list-style-type: none"> <li>• Demonstrate having taken into consideration the legislative and administrative provisions at Community and National, Regional level regarding sustainability, paying particular attention to soil, water, and environment management.</li> <li>• Report applications made to public administration bodies for grants/contributions for establishing/management of the plantation.</li> <li>• Establish objectives regarding the above matters</li> </ul>
5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest	Y	SFM	GL 1.3	"Management plans ... must be based on current legislation as well as existing land use plans, and sufficiently cover the forest resources and the protection of biodiversity. Monitoring of the forest resource and evaluation of its management must be periodically undertaken, with the results being fed back into the planning process.

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.			I 3.1 b	The Standard requires the landowner to include in Management Plan management objectives, methods for undertaking silvicultural operations, planning, maintaining inventories.
			All indicators Criterion 6, in particular I 6.3 a and 6.6 a	"Evidence of protection of rights of ownership, possession agreements and other use practices, with particular consideration for the correct definition of property boundaries, the possible use rights and the definition of hereditary succession processes." and "Management practices which have a social value."
		SPM	ITA 1004 3.2 (SPM improvement program).	"The Improvement Programme must grant the improvement of one or more improvable indicators during the validity time of the certificate. Every certified entity will have to indicate in his manual the chosen improvable indicators to be implemented during the validity time of the certificate.. The Improvement Programme must indicate: the indicator's number, the final goal for the 5 year of certification's validity, the intermediate goals, the proposed action for achieving the goal; the estimated time for reaching intermediate and final goals; the human and financial resources allotted or proposed; the responsible party for achieving the final aim"
5.1.3 Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.	Y	SFM	I 3.1 b	The text states that "Establishing and maintaining of inventory and mapping of forest resources, adequate to local and national conditions," meeting the requirement. The requirement for correspondence is met via the regulatory approvals for forest management planning, which require inventory and mapping.
			SPM	I 1.B planning
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.	Y	SFM	GL 1.3	"Management plans or their equivalent (see 3.1) appropriate to the size and use of the forest area, must be written and periodically updated. They must be based on current legislation as well as existing land use plan, and sufficiently cover the forest resources and the protection of biodiversity. Monitoring of the forest resource and the evaluation of its management must be periodically undertaken, with the results being fed back into the planning process."

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
		SPM	I 1.C planning	"Management plans or their equivalents, appropriate to the size and use of the forest area, should be elaborated and periodically updated. They should be based on legislation as well as existing land use plans, and adequately cover the forest resources."
5.1.5 Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products.	Y	SFM	I 3.1 b	"Description of resources to be managed ... maintaining and increasing health and vitality of forest ... wood production capacity and its valuations ... management activities connected with the production of non-timber products ..."
			Italian normative (n° 3267/23) makes mandatory the realisation of land-use plans	The general forestry law for Italy RDL 3267/23 concerning forests and mountain areas. The law requires that any forest activity is subject to land-use planning (whether forestry, tourism or otherwise). <sup>20</sup>
			SPM	I 3.C planning
5.1.6 A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is publicly available. The summary may exclude confidential business and personal information and other information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.	Y	SFM	ITA 1000 2.2.1.1 v)	"Make available to the public the summary of the management plan (or similar planning tools) through a document that contains the following list of criteria: amplitude of the planned area (in hectares) of forest and percentage of total certified properties; <ul style="list-style-type: none"> <li>• description of the main forest stands on the certified forest (extracted from the forest management plan, if any, or from public documents/scientific research /industry publications);</li> <li>• proportion of the total certified forest ownership of productive area, protected area, any area of total protection;</li> <li>• Duration of the management plan or similar planning tools, who has written, who approved it;</li> <li>• principles that were the guidelines of the management plan (or policies of the district planning/regional planning adopted by planning instruments);"</li></ul>
			ITA 1000 2.2.1.2 u)	"Make available to the public the summary of the management plan (or similar planning tools) through a document that contains the

<sup>20</sup> [www.provincia.grosseto.it/territorio/vincolo/leggi/rdl3267-1923.pdf](http://www.provincia.grosseto.it/territorio/vincolo/leggi/rdl3267-1923.pdf)

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				following list of criteria: <ul style="list-style-type: none"> <li>• amplitude of the planned area (in hectares) of forest and percentage of total certified properties;</li> <li>• description of the main forest stands on the certified forest (extracted from the forest management plan, if any, or from public documents/scientific research /industry publications);</li> <li>• proportion of the total certified forest ownership of productive area, protected area, any area of total protection;</li> <li>• Duration of the management plan or similar planning tools, who has written, who approved it;</li> <li>• principles that were the guidelines of the management plan (or policies of the district planning/regional planning adopted by planning instruments);</li> <li>• harvesting rate (indicating the objectives of this rate, for the stability and/or increase of the forest growth;</li> <li>• any other useful information for understanding the adopted management plan (for examples: activities aimed to biodiversity promotion, protection of sensitive areas, protection of historical valuable areas, etc.; peculiar harvesting and hauling techniques adopted in specific forest area; forestry techniques adopted for fire prevention; description of reasoning behind high forest conversion; description of reasoning behind coppice forest management as local economy promotional activity; forest activities aimed to promote landscape values, tourisms, etc..)"</li> </ul>
			ITA 1000 2.2.1.3 r)	"r) Make available to the public the summary of the management plan (or similar planning tools) through a document that contains the following list of criteria: <ul style="list-style-type: none"> <li>• amplitude of the planned area (in hectares) of forest and percentage of total certified properties;</li> <li>• description of the main forest stands on the certified forest (extracted from the forest management plan, if any, or from public documents/scientific research /industry publications);</li> <li>• proportion of the total certified forest ownership of productive</li> </ul>

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				<p>area, protected area, any area of total protection;</p> <ul style="list-style-type: none"> <li>• duration of the management plan or similar planning tools, who has written, who approved it;</li> <li>• principles that were the guidelines of the management plan (or policies of the district planning/regional planning adopted by planning instruments);</li> <li>• harvesting rate (indicating the objectives of this rate, for the stability and/or increase of the forest growth;</li> <li>• any other useful information for understanding the adopted management plan (for examples: activities aimed to biodiversity promotion, protection of sensitive areas, protection of historical valuable areas, etc.; peculiar harvesting and hauling techniques adopted in specific forest area; forestry techniques adopted for fire prevention; description of reasoning behind high forest conversion; description of reasoning behind coppice forest management ..."</li> </ul> <hr/> <p>SPM ITA 1004 2.2.1.1 o)</p> <hr/> <p>2.2.1.2 p)</p>
<p>5.1.7 Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.</p>	Y	SFM	GL 1.3	<p>"Monitoring of the forest resource and evaluation of its management must be periodically undertaken, with the results being fed back into the planning process."</p> <hr/> <p>The text is consistent with the requirement. In addition 1.D: "Monitoring of the forest resource and evaluation of its management must be periodically undertaken, with the results being fed back into the planning process."</p>
<p>5.1.8 Responsibilities for sustainable forest management shall be clearly defined and</p>	Y	SFM	ITA 1000 2.2.1	<p>" The applicants are the following entities: 1) The legal agent of the Territorial Group Association (TA) or its</p>

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
assigned.				<p>delegate for the territorial certification</p> <p>2) The legal agent of the Group (GR) or its delegate for the group certification</p> <p>3) The Owner, the manager or their delegates for the individual certification (IN).</p> <p>Legislative compliance is compulsory for the applicants who wish to commence a certification process in accordance with PEFC certification schemes. All the participants involved in certification (individual or as members of a GR or a TA) are responsible for ensuring that the activities of third parties are in compliance with the SFM criteria and indicators.</p>
		SPM	ITA 1004 2.2.1.1	<p>“The applicants are the candidates for certification. The applicants are the following entities:</p> <p>1) The legal agent of the Group (GR) or its delegate for the group certification</p> <p>2) The Owner (IN), the manager or their delegates for the individual certification.</p> <p>Legislative compliant is compulsory for the applicants who wish to start a certification process in accordance of both PEFC certification schemes.</p> <p>The Company must “Conform to the requirements dictated by the PEFC Italy certification scheme”;</p>
			2.2.1.2	Clearly assigns responsibility for implementing and respecting all aspects of SFM for the GR: “the members of the group must “conform to the requirements dictated by the PEFC Italy certification scheme;”
5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.	Y	SFM	GL 1.1	” Forest management practices must safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by favouring techniques that minimise direct or indirect damage to forest, soil or water resources.”
			I 1.1 a	Combination of indicators measures quantity and quality of forest and vegetation; critical threshold safeguard the resource
			I 1.1 b	Combination of indicators measures quantity and quality of forest and vegetation; critical threshold safeguard the resource

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
		SPM	1A planning 1B planning	The criteria safeguards the quantity and quality of the forest resources by balancing harvesting and growth rates
5.1.10 Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.	Y	SFM	GL 1.1 I 1.1 a	”Appropriate silvicultural measures must be taken to maintain the growing stock of resources at - or to reach - a level that is economically, ecologically and socially desirable.”
			I 1.1 b	Data sources and (land registers, forest management plans) provide the basis for the desirability of the growing stock according to economic, social and ecological outcomes.
		SPM	1A practice	” Forest management practices should safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.”
			1B practice	” Appropriate silvicultural measures should be taken to maintain the growing stock of resources at - or bring to - a level that is economically, ecologically and socially desirable.”
5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion: a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and b) entails a small proportion of forest type; and c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and	Y	SFM	I 1.1 a	There is effectively a blanket prohibition. “Reduction in forest cover area is not permitted (except for documented cases resulting from management and planning policies or instances where compensation is required according to the law in force)”
		SPM	Plantation is possible only in agricultural land	Italian law ‘Forestry Law 3267/1923 prohibits the conversion of forest land to other uses. This is further strengthened by ‘Galasso Law 431/1985’ ‘Forest Law 227/2001’.

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
d) makes a contribution to long-term conservation, economic, and social benefits.				
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.	Y	SFM	GL 1.2 I 1.2 a	" The transformation of abandoned rural and non-wooded zones into forested areas must be evaluated, considering all the elements and aspects of the region: economic, ecological, social, landscape, etc."
		SPM	1c Practices	"Conversion of abandoned agricultural and treeless land into forest land should be taken into consideration, whenever it can add economic, ecological, social and/or cultural value."
<b>Criterion 2: Maintenance of forest ecosystem health and vitality</b>				
5.2.1 Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.	Y	SFM	I 3.1 b	" Forest management planning requirements incorporate a requirement for this to be present in planning guidelines, specifically "Maintaining and increasing of health and vitality of forest and rehabilitating of degraded forest ecosystems, whenever this is possible by silvicultural means and by fighting the degradation causes"":
		SPM	2A Planning	"Forest management planning should aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means."
5.2.2 Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	Y	SFM	I 2.1 a	" Forest management practices must make the best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests." Indicator specifies: "Serious damage caused by biotic and abiotic agents: serious damage caused by insects and diseases where the valuation of the severity of the damage is a function of mortality or decrease in growth; annual area of forest or other wooded lands affected by fire; annual area subjected to wind and snow damage, and the subsequent timber

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				volumes deriving from these events; presence of serious forest damage due to game; presence of serious forest damages due to grazing.." A system must be present for monitoring and recording.
		SPM	2B planning	" Health and vitality of forests should be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations."
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.	Y	SFM	I 2.1 a	The indicators includes damage caused by: biotic/abiotic agents, insects and diseases, fire, wind and snow, game and grazing "and the subsequent timber volumes deriving from these events."
		SPM	2B planning	" The owner/manager must: monitor – at appropriate intervals based on the size of the company– the damage caused by biotic and abiotic factors and by management activities;
5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.	Y	SFM	I 3.1 b	The indicator incorporates "minimizing the degradation risk and the damages to the ecosystems ..."
		SPM	2C planning	" Forest management plans or their equivalents should specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning should make use of those policy instruments set up to support these activities."
5.2.5 Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	Y	SFM	GL 2.1	"Forest management practices must make the best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity must be encouraged and/or maintained to enhance the stability, vitality and resistance of the forest to adverse environmental factors and strengthen natural regulation mechanisms."
			I 3.1 b	Measurement parameters for planning require references to: using silvicultural techniques in order to maximise the ecosystem resistance against parasitic attacks, meteorological events and fires; protection of forest biodiversity; maintaining of natural habitats for biodiversity
		SPM	2A practice	" Forest management practices should make best use of natural structures and processes and use preventive biological measures

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity should be encouraged and/or maintained to enhance stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms." Managers must "adopt poplar pest and disease control techniques ... limit mineral fertilizer use in good site conditions ... limit the setting up of mono-clonal plantations."
			4A planning	"Forest management planning should aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level, and where appropriate the landscape level."
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.	Y	SFM	I 2.2 a	"Presence of activities aimed at avoiding fires (except for the prescribed fires)"
			I 3.1 b	The reference given in the checklist (I 3.1b) isn't applicable
		SPM	2B planning	The guidelines state that potential threats to forest health and vitality should be monitored, including the use of fire. The guidelines state that there should be a records monitoring this in the plantation areas; it is therefore not applicable at the FMU level.
5.2.7 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied. The spillage of oil during forest management operations or the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.	Y	SFM	GL 2.2	" Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of growing, harvesting and transport techniques that minimise tree and/or soil damages, fire prevention methods must be applied. The spillage of oil through forest management operations or the indiscriminate disposal of waste on forest land must be strictly avoided."
			I 2.2 a	"Non-organic" requirement is not specified. However, this is covered by EU-wide regulations. The European Union Waste Directive (Dir 2008/98/CE) with the Legislative Decree D Leg 3 dic 2010, number 205 (SISTR) contains an obligation to collect, select and dispose all kind of waste from work activity.
		SPM	2B practices	" Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages should be applied.

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				The spillage of oil through forest management operations or the indiscriminate disposal of waste on forest land should be strictly avoided."
			4B practices	"Non-organic" requirement is not specified. However, this is covered by EU-wide regulations. The European Union Waste Directive (Dir 2008/98/CE) with the Legislative Decree D Leg 3 dic 2010, number 205 (SISTR) contains an obligation to collect, select and dispose all kind of waste from work activity
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	Y	SFM	GL 2.1	"use preventive biological measures"
			GL 2.3	"The use of pesticides and herbicides and GMO is not-allowed ..."
			GL 2.4	" The use of pesticides and herbicides must be avoided in natural and semi-natural forests."
			I 2.2 a	"Presence of recording and monitoring systems of the use of pesticides and fertilizers as an assumption to minimize their use"
		SPM	2C practices	"The use of pesticides and herbicides should be minimised, taking into account appropriate silvicultural alternatives and other biological measures.
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.	Y	SFM	GL 2.2	" The use of pesticides and herbicides and GMO is not allowed in natural and semi-natural forests, except for justified phytosanitary reasons, excluding in any case the WHO Type 1A and 1B pesticides, those pesticides whose derivatives remain biologically active and accumulate in the food chain beyond their intended use and any pesticides banned by international agreement. For biotechnologies and GMO the approach must be precautionary implementing them only after experimentation has shown the absence of their impact on the ecosystem."
			SPM	2C practices
5.2.10 Pesticides, such as chlorinated	Y	SFM	GL 2.3	"The use of pesticides and herbicides and GMO is not allowed in

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.				natural and semi-natural forests, except for justified phytosanitary reasons, excluding in any case the WHO Type 1A and 1B pesticides, those pesticides whose derivatives remain biologically active and accumulate in the food chain beyond their intended use and any pesticides banned by international agreement. For biotechnologies and GMO the approach must be precautionary implementing them only after experimentation has shown the absence of their impact on the ecosystem.”
		SPM	2C practices	“The use of pesticides and herbicides and GMO is not allowed in natural and semi-natural forests, except for justified phytosanitary reasons, excluding in any case the WHO Type 1A and 1B pesticides, those pesticides whose derivatives remain biologically active and accumulate in the food chain beyond their intended use and any pesticides banned by international agreement. For biotechnologies and GMO the approach must be precautionary implementing them only after experimentation has shown the absence of their impact on the ecosystem.”
5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	Y	SFM	GL 2.4	This is not specified other than that pesticides must be avoided. This is therefore correct, but 6.7 and 6.8 should also be considered as evidence as they refer to training and occupational health and safety, i.e. “Forest managers, contractors, employees and forest owners must be provided with sufficient information and encouraged to keep up to date through continuous training in relation to sustainable forest management Particular attention must be paid to the training, professional updating, informing and other social services of the workers and the local community. All those involved in the certification process (individual or as members of the GR or of the AR) must ensure that the activities and the operations of third parties conform to and are in accordance with the criteria and the indicators of the GFS.”
		SPM	Compulsory by Italian agricultural law	Italian Legislative Decree No 150/2012 (Articles 7, 8, 9), which implement European Union Directive No 2009/128/EC, which mandates training for users of pesticides.

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	Y	SFM	1.1 a	The correct reference is 2.2a, where the minimisation of fertiliser use is specified. “Presence of an administrative framework for maintaining the health and vitality of the forest ecosystems. Presence of recording and monitoring systems of the use of pesticides and fertilisers as an assumption to minimize their use.”
		SPM	2C practice	“In case fertilisers are used they should be applied in a controlled manner and with due consideration to the environment.” “The owner/manager must:... • specify the purposes and dates (period) of application of fertilizers and the quantities used; “PEFC technical standards” Documents par. 5 points 2, 3, 4, 5, 6, 7, e 8; ...• register and keep records of purchase of commercial products used. If fertilizing operations are contracted out, the contract for services or contract by tender must include the treatment indications specified in the action plan and in the “PEFC technical standards”.
<b>Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)</b>				
5.3.1 Forest management planning shall aim to maintain the capability of forests to produce a range of wood and non- wood forest products and services on a sustainable basis.	Y	SFM	GL 3.2	“The quality of forest management practices must be ensured, in order to maintain and improve the forest resources and to encourage a diversified output of goods and services over the long term..”With the subsequent relevant indicator for planning: The collection of information on the goods and services produced by the forest, in planning and forestry administration at company and group organization level, must be enhanced.
			GL 3.3	Harvesting levels ... Must not exceed a rate that cannot be sustained in the long term ...
			I 3.1 b	The indicator includes management requirements that refer to both wood and non-wood products that aim to maintain these products on a sustainable basis
		SPM	3A planning	“Forest management planning should aim to maintain the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis.”

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
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.	Y	SFM	I 3.2 a	Areas for improvement specify that production should not decrease over time and also stipulate that information on services and goods should be enhanced; examples of data sources include specific research and local studies
			GL 6.1	GL states that planning "must aim to respect the multiple functions of forests to society, have due regard to the role of forestry in rural development and in particular consider the new opportunities for employment in connection with the forest's socio economic functions and with their active sustainable management.
			ITA 1001-2 3.1 c	Measurement parameters for this indicator specify a regulatory framework that assists management planning with the aim to maintain or increase a sustainable output of goods and services.
		SPM	3B planning	"Forest management planning should aim to achieve sound economic performance taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests."
5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.	Y	SFM	GL 3.1	Measurement parameters (3.1.a) specify grazing rights, non-timber products, recreational services.
			ITA 1001-2 3.1 a	Specifies a " a regional set of rules in force or those undergoing revision"
			ITA 1001-2 3.1 c	This indicator specifies regulatory frameworks and financial instruments with the aim to inform planning that will contribute to non-forest products, recreation
		SPM	3C planning	"Forest management plans or their equivalents should take into account the different uses or functions of the managed forest area. Forest management planning should make use of those policy instruments set up to support the production of merchantable and non-merchantable forest goods and services. "At the planning phase, the owner/manager must indicate the potential funds (Regional, National and Community sources) for the activities and the obtainable assortments from the plantation"
5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the	Y	SFM	GL 3.2	"The quality of forest management practices must be ensured, in order to maintain and improve the forest resources and to encourage a diversified output of goods and services over the long term.."

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
long term.		SPM	3A practices	"Forest management practices should be ensured in quality with a view to maintain and improve the forest resources and to encourage a diversified output of goods and services over the long term."
5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.	Y	SFM	GL 3.4	" Forest growth operations and the exploitation of forest products must be carried out in appropriate manner and times so as not to reduce the productive capacity of the concerned forests and to favour techniques with a low environmental impact relating to the specific site conditions, also taking into consideration aesthetic aspects and all the services linked to the presence of the wood."
			I 3.4 a	"Removal of tree biomass"
			I 3.4 b	" Forest utilisation techniques"
			I 5.2 b	" Soil working in forest areas."
			I 5.2 a	Addresses harvesting in specific forests "Silvicultural practices in coppices and high forests" in relation to avoiding damage in high and coppice forest.
			I 5.2 c	" Criteria for undertaking timber stacking and logging" in relation to regeneration.
		SPM	3B practices	" Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems"
5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.	Y	SFM	I 1.1 b	Addresses harvesting levels by establishing a baseline
			I 3.1 b	Addresses forest management planning over the long term
			I 3.2 a	Specifies benefits "should not decrease over time"
			I 3.3 a	Measurement of the yield over time, which should provide consideration to nutrient offtake.
			GL 3.	Includes a reference period.
		SPM	3C practices	"Harvesting levels of both wood and non-wood forest products should not exceed a rate that can be sustained in the long term and optimum use should be made of the harvested forest products, with due regard to nutrient offtake."
5.3.7 Where it is the responsibility of the forest owner/manager and included in forest	Y	SFM	I 3.2 a	Measurement parameters include regulation (allocations for game), monitoring (recorded production figures) and controlled (licenses and

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.		SPM	NA	permits) This is not applicable to Italian plantations because of Italian regulations on hunting and gathering; game is effectively owned by the Italian state; hunting is regulated by the provision of hunting licenses and hunters may enter any properties that are not fenced. This is specified in the Italian Civil Code; Articles 841 permit the enclosure of properties at any time, but Article 842 permits access to land if not enclosed.
5.3.8 Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.	Y	SFM	I 3.5 a	Requires planning; also specifies compatibility with an efficient utilisation of goods and services ...
			I 3.5 b	"must affect as little as possible of river beds and water courses" and "maintenance must minimise the negative impacts"
		SPM	NA	3D planning states "Adequate infrastructure, such as roads, skid tracks or bridges should be planned, established and maintained to ensure efficient delivery of goods and services while at the same time minimising negative impacts on the environment." However, this is not applicable for Italian plantations because of their establishment on agricultural rather than forest land.
<b>Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems</b>				
5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.	Y	SFM	I 3.1 b	Addresses local forest management planning, which must include measures for "Maintaining of natural habitats for biodiversity;
			I 4.2 a	Addresses native and introduced species with the overall objective of enhancing the former
			I 4.2 c	Addresses biodiversity at ecosystem level via reforestations
			I 4.8 b	Safeguard of habitat and threatened species (conservation)
			I 4.8 c	Safeguarding and protection of rare species and habitats
		SPM	4A planning	" Forest management planning should aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level and, where appropriate, diversity at landscape level."; The owner/manager must choose clones suitable for the site conditions of the plantation.

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:	Y	SFM		
a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;			I 3.1 b	Addresses forest management planning, inventory and mapping references; directives for particular biotopes, rare or endangered species management, protection of biodiversity, maintaining of natural habitats for biodiversity
b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;			I 4.8 b	Safeguard of habitat and threatened species (conservation); reference to Nature 2000 sites; See also Annex 3 I 4.2b; normative indicator according to IUCN lists
c) endangered or protected genetic in situ resources;			I 4.8 c	Safeguarding and protection of rare species and habitats
and taking into account d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.			4.7	Specifies water source presence and management
		SPM	4B planning	Forest management planning and terrestrial inventory and mapping of forest resources should include ecologically important forest biotopes, taking into account protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes, areas containing endemic species and habitats of threatened species, as defined in recognised reference lists, as well as endangered or protected genetic in situ resources. ... “The owner/manager must supplement what is established in Criteria 1, Management Planning Guideline point b) with information about protected areas bordering on poplar plantation and included in the same municipal/administrative area”
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.		SFM	I 3.1 b GL 4.5 I 4.5 a I 4.8 c I 5.3 a	All criteria and indicators listed require the protection of and enhancement of populations of rare and endangered species; there is no specified prohibition on commercial exploitation but the intent of the criteria and indicators effectively prohibit commercial exploitation. Commercial exploitation of endangered species is prohibited under Italian laws and regulations, specifically <i>Act No. 157</i> :

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				<i>provisions for the protection of wildlife and restrictions on hunting, and regional implementing regulation, as well as Act No. 221 on green economy and making provisions to reduce the overexploitation of natural resources.</i>
		SPM	NA	Management planning under 4A and 4B require the planning for protection and conservation of species. Alongside this, forest plantations in Italy are established on agricultural land rather than forest land. This is an indirect result of the Italian Law 431/1985 (the 'Galasso Law') which limits the silvicultural activities that can be undertaken on forest land. Commercial exploitation of endangered species is prohibited under Italian laws and regulations, specifically Act No. 157: <i>provisions for the protection of wildlife and restrictions on hunting</i> , and regional implementing regulation, as well as Act No. 221 on green economy and making provisions to reduce the overexploitation of natural resources.
5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.	Y	SFM	I 4.1 a	" Proportion of annual area of natural regeneration related to the total area of regeneration" With a critical threshold of "Forest area allocated for natural regeneration should be above 70 % of the total area allocated for regeneration."
		SPM	4A practices Appendix 1 Appendix 2	An assessment parameter is not specified. Natural regeneration is not applicable to Italian plantations; forest plantations in Italy are established on agricultural land rather than forest land. This is an indirect result of the Italian Law 431/85 (the 'Galasso Law') which limits the silvicultural activities that can be undertaken on forest land. Planting in these circumstances falls under the technical standards for poplar and plantation management. These can be considered as adequate to ensure the quantity and quality of the forest resources.
5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic	Y	SFM	<u>I 4.1 a</u> <u>I 4.2 a</u> <u>I 4.2 b</u> I 4.2 c	The indicators place appropriate thresholds on the introduction of species by both type and by area. Data sources and information gathering for choice of species is consistent with the requirement for evaluation. "Indicator 4.1.a Proportion of annual area of natural regeneration related to the total area of regeneration."

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.				“Indicator 4.2.a Differentiation between native and introduced species. “Indicator 4.2.b Quality of propagation material.” “Indicator 4.2.c Maintenance of appropriate biological diversity in reforestations.”
				SPM
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	Y	SFM	I 4.3a I 4.3b.	4.3.a Change in the proportion of mixed forests composed of 2 or more species. 4.3.b Change in the proportion of mixed forests which are not single-stratified. “CRITICAL THRESHOLD: Forest surface covered with forest types which are ecologically adapted to the site, according to composition and structure, should be more than 50% of the total area. AREAS FOR IMPROVEMENT: Improving the stand composition according to the most suitable forest type for the site, encouraging, when possible, mixed and multi-storied cultivation models, favouring rare species.”
				SPM
5.4.7 Genetically-modified trees shall not be used.	Y	SFM	GL 2.3	ITA 1000 states a ‘general principle’ that GMOs ‘must not be introduced.’ The GL provides an exemption in circumstances where experimentation has shown the absence of their impact. However,

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				the GL does not have any indicators; this would effectively mean that the operational guideline cannot be implemented for such an exception.
		SPM	2C practices Reference to scheme documentation	As above
5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.	Y	SFM	I 4.3 a I 4.3 b	Indicator 4.3.a Change in the proportion of mixed forests composed of 2 or more species. Indicator 4.3.b Change in the proportion of mixed forests which are not single-stratified.
		SPM	4C Practices	" Forest management practices should, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices should also aim to maintain and restore landscape diversity." "The owner/manager of a plantation (except for poplar plantations) must promote a vertical structure and a mix of species."
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	Y	SFM	Annex 2: Introduction, GL 1.1, I 1.1.a, GL 3.3, I 5.2.a	The Standard addresses traditional management systems in the Introduction via a broader description of Italian silvicultural systems, specifically coppice systems. This is further addressed in a number of Operational Guidelines and Indicators. Indicator 5.2.a: Silvicultural practices in coppices and high forests. NORMATIVE INDICATOR MEASUREMENT PARAMETERS: Width of clear cuts in coppices. Clear cuts and soil cover in high forests. CRITICAL THRESHOLD: - In coppices located in areas where the average gradient of the slope is equal or greater than 80%, clear cuts are forbidden, except if specific alternative prescriptions are given by the approved forest management plan or equivalent planning tools. In coppices located in areas where the average slope is between 50% and 80%, clear fell areas should not exceed 2 ha on areas at high erosion risk, and 5 hectares in other cases. On slopes where the

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				average gradient is less than 50%, clear fell areas must not be above 10 hectares, except if specific alternative prescriptions are given by the approved management plan, or equivalent planning tools. - In high forest stands, clear cutting is forbidden on an area greater than ½ of a hectare, except in instances when it is necessary for the natural regeneration of the woodland or, if specifically prescribed, by the approved forest management plan or equivalent planning/authorisation tools, or for the general health of the forest. Tree stand density should be higher than 50% of the density range that is typical for the forest type and silvicultural regime.
		SPM	NA	“Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites should be supported, when economically feasible.”
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.	Y	SFM	GL 2.2	The GL directive addresses minimising tree and soil damage
			I 3.1 b	Indicators for management planning address minimizing degradation risk and damage to forest ecosystems
			5.2 c	Addresses minimising damage during harvesting operations; see also 4.8a 4.8b and 4.8c
		SPM	4B practices	The correct reference is 4E practices -- this is consistent with the text. “Tending and harvesting operations should be conducted in a way that do not cause lasting damage to ecosystems. Wherever possible, practical measures should be taken to improve or maintain biological diversity.” “Fertilizing, pruning, soil managing, disease control, use and choice of plant protection products”
5.4.11 Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	Y	SFM	GL 4.4	“ Infrastructures must be planned and constructed in such a manner that damage is minimised to ecosystems, especially to rare, fragile or representative ecosystems and genetic reserves. Threatened or other key species, and in particular their migration patterns, must be taken into consideration.”
			I 4.4 a	“ Directives and prescriptions on forest utilisation operations and building of infrastructures in rare, fragile or representative

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
		SPM	4F practices	ecosystems, where these ecosystems are present.” A threshold and assessment parameter are not specified as this is not relevant to Italian plantations. Forest plantations in Italy are established on agricultural land rather than forest land. This is an indirect result of the Italian Law 431/85 (the ‘Galasso Law’) which limits the silvicultural activities that can be undertaken on forest land. Ecosystems in these circumstances are essentially simple artificial ecosystems.
5.4.12 With due regard to management objectives, measures shall be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity.	Y	SFM	GL 4.5	” With due regard to management objectives, measures must be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity. Measures must also be included for the protection of rare, threatened and endangered species and for the safeguarding of their habitat and food species.”
			I 4.5 a	” Monitoring and checking of damage due to the presence of wildlife populations.”
			I 4.5 b	” Indicator 4.5.b Grazing in forest of domestic animals.”
			SPM	4G practices
5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.	Y	SFM	I 3.1 b	Addresses planning aspect in relation to "decomposition"
			I 4.6 a	Indicator 4.6.a Dead, monumental, historical and rare tree species. MEASUREMENT PARAMETERS: Dead, monumental, or rare species, indication of the species and estimation in number per surface unit:_____. Presence of dead wood on the ground CRITICAL THRESHOLD: Leaving monumental trees, if present. Leaving some of the rare species trees, if present. Leaving dead trees or parts of them on the ground.

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
		SPM	4H Practices	The indicator is addressed but is 'Not applicable' for plantations; this is appropriate given the nature of plantations in Italy.
<b>Criterion 5: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)</b>				
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.	Y	SFM	I 3.1 b	Mandates planning aspect related to "Management objectives, the location (to be shown on maps) and description of resources to be managed and of areas for protective functions;
			I 5.1 a	Indicator addresses tools for planning specifically relating to protection function. "Availability of forest thematic maps which represent the main function of forests, particularly referring to the protective one."
			I 5.1 b	" Amount of forest area managed for protective purposes and its variation over time."
			I 5.2 a	Addresses high gradients and clear fell areas (soil)
			GL 3.5	Addresses infrastructure and protection of
			I 3.5 b	Addresses protection of water resources
		SPM	5A planning	" Forest management planning should 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."
5.5.2 Areas that fulfil specific and recognised protective functions for society shall be registered and mapped, and forest management plans or their equivalents shall take these areas into account.	Y	SFM	I 3.1 b	Addresses management objectives, location and description of resources for protective function: "Mandates planning aspect related to "Management objectives, the location (to be shown on maps) and description of resources to be managed and of areas for protective functions;"
			I 4.8 b	NA
			I 5.1 a	Addresses availability of information (mapping) for protective functions: "Availability of forest thematic maps which represent the main function of forests, particularly referring to the protective one."

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
		SPM	5B planning	" Areas that fulfil specific and recognised protective functions for society should be registered and mapped, and forest management plans or their equivalents should take full account of these areas."
5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.	Y	SFM	I 4.5 a	Addresses minimisation of animal pressures, both wildlife and domestic animals: "Monitoring and checking of damage due to the presence of wildlife populations."
			I 4.5 b	" Indicator 4.5.b Grazing in forest of domestic animals."
			I 5.2 a	"Indicator 5.2.a: Silvicultural practices in coppices and high forests." -- Addresses erosion prone areas, e.g. "In coppices located in areas where the average gradient of the slope is equal or greater than 80%, clear cuts are forbidden, except if specific alternative prescriptions are given by the approved forest management plan or equivalent planning tools"
			I 5.3 a	" Indicator 5.3.a: Silvicultural practices in protective forests", specifically aimed at maximising protective function.
		SPM	5A practices	" Special care should be given to silvicultural operations on sensitive soils and erosion-prone areas as well as on areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery should be avoided on such areas. Special measures to minimise the pressure of animal population on forests should be taken."
5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.	Y	SFM	I 2.2 a	" Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of growing, harvesting and transport techniques that minimise tree and/or soil damages, fire prevention methods must be applied. The spillage of oil through forest management operations or the indiscriminate disposal of waste on forest land must be strictly avoided."
			GL 2.3	Prohibits use of pesticides and herbicides
			GL 2.4	As above
			I 4.7 a	Addresses minimising damage to wetlands with reference to management planning
		SPM	5B practices	" Special care should be given to forest management practices on

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				forest areas with water protection function to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way should be avoided.
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.	Y	SFM	I 3.5 a	Addresses forestry road network in relation to 'hydro-geological balance: "Presence of a forest road plan. The forest road system must be compatible with an efficient utilisation of goods and services produced by the forest as well as with the hydro-geological balance, landscape, plant health and wildlife aspects of the concerned ecosystems."
			I 3.5 b	Addresses new forest road construction; "must affect as little as possible" river beds and water courses ... Processes of erosion and the degrading of soil."
			GL 3.5	" The infrastructures like roads, bridges and skid tracks, have to be planned, built and maintained in such a way to guarantee an efficient goods and services distribution and to minimize the negative environmental impacts at the same time."
			I 5.2 b	" Soil working is not allowed throughout the forest, particularly the gathering of leaf litter, mould or turf. An exception may be permitted where provision for such removal is made in the forest management plan (Indicator 3.1.a) or interventions authorized on the basis of procedures which are in force."
			I 5.2 c	This reference appears to be incorrect  'Proper road drainage' is not addressed in the documentation. However, there are legislative requirements that make installation of road drainage a necessary part of approvals. Forest roads are subject to a municipality building permission, municipalities have to verify the conformity of the project to all existing norms. Regional Forest Laws prescribe technical standard: one important is the drainage system of the road, according to the characteristic of the slope and area. An example provided at the Provincial Level (Trento) is the For instance for the Autonomous Province of Trento

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				LP 11/2007: Law for the forests, mountain area and streams and protected areas; Regulation 3.11.2008, 51-158 Leg; LP 1/2008: Land Planning and Building Law.
		SPM	5C practices	Establishment of an assessment parameter and threshold is not appropriate for Italian plantations as they are established only on agricultural land (as per the Galasso Law) and small (ca 5 hectares average). In these cases, the establishment of infrastructure is regulated by regional land planning and building laws (see above), covering water courses.
<b>Criterion 6: Maintenance of other socio-economic functions and conditions</b>				
5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.	Y	SFM	I 3.2 a	This supports the overall aims in the requirement by addressing the consistent production of all benefits from wood/non-wood products.
			GL 6.1	" Forest management planning must aim to respect the multiple functions of forests to society, have due regard to the role of forestry in rural development, and in particular consider new opportunities for employment in connection with the forest's socio-economic functions and with their active sustainable management."
			I 6.1 a	" Undertaking operations that have a positive direct and indirect occupational Impact"
			I 6.2 a	" System for the evaluation of the socio-economic functions of interest to the individual organisation and society, in general."
			SPM	6A planning

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
				Italian regions.
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	Y	SFM	GL 6.7	“Forest managers, contractors, employees and forest owners must be provided with sufficient information and encouraged to keep up to date through continuous training in relation to sustainable forest management. Particular attention must be paid to the training, professional updating, informing and other social services of the workers and the local community.”
		SPM	NA	As stated above, Italian plantations are established only on agricultural land. In these cases, forest management areas fall within agricultural communities rather than vice versa, or being adjacent to these communities.
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.	Y	SFM	I 6.3 a	“Evidence and protection of rights of ownership, possession agreements and other use practices, with particular consideration for the correct definition of property boundaries, the possible use rights and the definition of hereditary succession processes.”
			I 6.5 a	” Indicator 6.5.a Forests with historical, cultural and spiritual significance”
			SPM	6B planning
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	Y	SFM and SPM	All Fundamental ILO Conventions have been ratified by Italian Government <a href="http://www.ilo.org/ilolex/english/newratframeE.htm">http://www.ilo.org/ilolex/english/newratframeE.htm</a> The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) was adopted by the General Assembly on Thursday, 13 September 2007,	ILO 169 has not been signed by the Italian Government or any other European Union member states. However, there are no indigenous people living in Italy. The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) was adopted by the General Assembly on Thursday, 13 September 2007, with the positive vote of Italy. The Standard notes that the respect for regional, national and EU laws is a “compulsory prerequisite”.

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.			with the positive vote of Italy. However Italy does not have Indigenous people in his country	
5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	Y	SFM	I 6.4 a	Areas of improvement stipulate programmes for improving accessibility, taking into account the forest management plan. "Indicator 6.4.a Amount of forests accessible to public for recreational purposes." It is also noted that "Pursuant to the relevant Civil Code articles, all fenceless private and public properties are subject to the right of way."
		SPM	6C planning	However, plantations are only present on and can only be established on agricultural land. According to the Italian civil code, access to plantation forests (specifically plantations on agricultural land or otherwise) is permitted for activities such as hunting as long as the land is not enclosed for other purposes, such as to prevent damage to forests or crops. The Standard also stipulates in 6B (planning) that 'Property rights and land tenure arrangements should be clearly defined, documented and established for the relevant forest area.' It is the Consultant's judgement that the establishment of these rights effectively determines the appropriateness of public access.
5.6.6 Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.	Y	SFM	I 4.6 a I 6.5 a	Requires: "Dead, monumental, historical and rare tree species." " Forests with historical, cultural and spiritual significance"; "Presence of measurement parameters and planned activities of protection."
		SPM	6D planning	This is not applicable for Italian plantations; they are established on agricultural land. The protection of cultural, historical and significant sites is addressed by Italian legislation (Law 1773 of 1933).
5.6.7 Forest management operations shall take into account all socio-economic functions, especially the recreational function and aesthetic values of forests by maintaining for example	Y	SFM	GL 3.4	" Forest growth operations and the exploitation of forest products must be carried out in appropriate manner and times so as not to reduce the productive capacity of the concerned forests and to favour techniques with a low environmental impact relating to the specific

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
varied forest structures, and by encouraging attractive trees, groves and other features such as colours, flowers and fruits. This shall be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land			I 3.1 b	site conditions, also taking into consideration aesthetic aspects and all the services linked to the presence of the wood.”
			I 6.4 a	Addresses management planning aspects for recreation within broader management objectives: “Methods for undertaking silvicultural operations, considering grazing and rights of use, as well as management activities connected with the production of non-timber products and recreational services (when these activities occur in the area under consideration);
			I 6.6 a	” Indicator 6.4.a Amount of forests accessible to public for recreational purposes.”
			I 6.6 a	” Indicator 6.6.a Management practices which have a social value.”
		SPM	6C practices	An assessment parameter and threshold is not present. This is applicable for Italian plantations; as mentioned previously they are established only on agricultural land; the aesthetic and recreational functions of plantations must therefore be considered within this context. It should also be noted that agritourism has been addressed in Italian legislation (Law n. 96 of 20 February 2006, “Regulation of agritourism” published in the Italian Gazzetta Ufficiale n. 63 of 16 March 2006). Article 1 includes: “promoting initiatives by farmers for the conservation of soil, land and environment through increased farm incomes and improvements in the quality of life; recovering the rural architectural heritage by protecting the features of the landscape; supporting and promoting typical local products, high quality products, and related food and wine traditions; promoting rural culture and education in nutrition; encouraging the development of agriculture and forestry.”
5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.	Y	SFM	GL 6.7 I 6,7 a I 6.7 b	” Forest managers, contractors, employees and forest owners must be provided with sufficient information and encouraged to keep up to date through continuous training in relation to sustainable forest management. Particular attention must be paid to the training, professional updating, informing and other social services of the workers and the local community. All those involved in the certification process (individual or as members of the GR or of the AR)

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
		SPM	6E planning	<p>must ensure that the activities and the operations of third parties conform to and are in accordance with the criteria and the indicators of the GFS.”</p> <p>” Forest managers, contractors, employees and forest owners should be provided with sufficient information and encouraged to keep up to date through continuous training in relation to sustainable forest management.”</p>
<p>5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.</p>	Y	SFM	<p><u>ITA 1000 2.2.1.1 – t</u></p> <p><u>ITA 1000 2.2.1.2 - s</u></p> <p><u>ITA 1000 2.2.1.3 – o</u></p>	<p>This aspect falls within the responsibilities of participants and groups. All three are required to: “Periodically organize meetings with the “interested parties” (at least one each validity time of the certificate). If it is possible with the certification bodies’ participation. at least on an annual basis (for example government agencies, citizens associations, environmental organisations etc.), so as to provide detailed information for the PEFC certification and to gather other information regarding forest management, which the [participant] should use appropriately, if it is relevant. The public consultation must consider environmental factors (e.g. forests with special conservation value), social factors (e.g. cultural values and impact on the community) and economic factors regarding the forest management in the area which is the object of certification. The public consultation must explicitly include stakeholders and local experts. The information gathered during public consultations (through any means, be it written, video or audio) must be conserved and used as documented evidence during the audit by the CB; The Standard supports forest management practices to make use of local forest-related experiences and knowledge via the Group, Territorial Association and Individual Applicants.</p>
		SPM	6A practices	<p>” Forest management practices should make the best use of local forest related experience and knowledge, such as of local communities, forest owners, NGOs and local people.</p>
<p>5.6.10 Forest management shall provide for</p>			ITA 1000 2.2.1.1 – t	<p>This aspect falls within the responsibilities of participants and groups.</p>

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
<p>effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.</p>			<p>ITA 1000 2.2.1.2 - s ITA 1000 2.2.1.3 – o</p>	<p>All three are required to: “Periodically organize meetings with the “interested parties” (at least one each validity time of the certificate). If it is possible with the certification bodies’ participation. at least on an annual basis (for example government agencies, citizens associations, environmental organisations etc.), so as to provide detailed information for the PEFC certification and to gather other information regarding forest management, which the [participant] should use appropriately, if it is relevant. The public consultation must consider environmental factors (e.g. forests with special conservation value), social factors (e.g. cultural values and impact on the community) and economic factors regarding the forest management in the area which is the object of certification. The public consultation must explicitly include stakeholders and local experts. The information gathered during public consultations (through any means, be it written, video or audio) must be conserved and used as documented evidence during the audit by the CB;</p>
			<p>ITA 1000 2.2.1.1 – w ITA 1000 2.2.1.2 - w ITA 1000 2.2.1.3 –s</p>	<p>Groups, associations and companies “shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.</p>
		SPM	<p>ITA 1004 2.2.1.1. n)</p>	<p>The Company must: “organize meetings with external parties (e.g. government agencies, community groups, conservations organizations, etc.) to offer information regarding forest certification and to collect relevant information related to forest management, that will use, if appropriated.”</p>
			<p>2.2.1.2 o)</p>	<p>A group entity must “The Company must: “organize meetings with external parties (e.g. government agencies, community groups, conservations organizations, etc.) to offer information regarding forest certification and to collect relevant information related to forest management, that will use, if appropriated.””</p>

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	Y	SFM	I 6.8 a	" Indicator 6.8.a Prevention of accidents within companies carrying out works on their own or subcontracting"; "Wood management operations must be carried out in such a way as to protect the health and safety of the workers and any others who may be present."
			I 6.8 b	" Indicator 6.8.b Training courses concerning safety if relevant."; "Attendance at training and security training courses."
		SPM	6B practices	" Working conditions should be safe, and guidance and training in safe working practice should be provided." Consistently with the size of the company, the owner/manager must demonstrate: <ul style="list-style-type: none"> <li>• the adoption of measures and actions on safety related to management activities in the plantation;</li> <li>• attendance at refresher courses on safety.</li> </ul>
			Compulsory works safety legislation Dgls 81/2008	Fulfils requirement according to Italian law
5.6.12 Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.	Y	SFM	I 6.8 a	" Indicator 6.8.a Prevention of accidents within companies carrying out works on their own or subcontracting"; "Wood management operations must be carried out in such a way as to protect the health and safety of the workers and any others who may be present."
			I 6.8 b	" Indicator 6.8.b Training courses concerning safety if relevant."; "Attendance at training and security training courses."
		SPM	6B practices	Working conditions should be safe, and guidance and training in safe working practice should be provided." Consistently with the size of the company, the owner/manager must demonstrate: <ul style="list-style-type: none"> <li>• the adoption of measures and actions on safety related to management activities in the plantation;</li> <li>• attendance at refresher courses on safety.</li> </ul>
5.6.13 Forest management shall comply with fundamental		SFM and SPM	All Fundamental ILO Conventions have been ratified by Italian Government <a href="http://www.ilo.org/ilolex/english/">http://www.ilo.org/ilolex/english/</a>	Consistent with the requirement

Question	Y/N	SFM /SPM	Reference to scheme documentation	Comment or text
			newratframeE.htm	
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.	Y	SFM	ITA 1000 introduction	Addresses 'contribute to research'; forest management based on research is stipulated throughout 1001 in 'information gathering'
		SPM	6a practices	" The owner/manager must demonstrate that the cultivation practices adopted have been validated both by operational experience in the plantation area and by research programmes.
<b>Criterion 7: Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water)</b>				
5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.	Y	SFM	ITA 1001-1 introduction	" The respect for legislation (laws) at various levels (regional, national and EU) is a compulsory pre-requisite, and therefore not specified in the various indicators. In the case of group certification, only the members of the PEFC group will be considered certified; only their forest area will be considered certified and only the forest material coming from these areas will, therefore, be considered certified."
		SPM	ITA 1004 (Description) 2.1	" Compliance to legislation is a prerequisite in all certification schemes."
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.	Y	SFM	2.2a	Requirement of a surveillance system for the "forest's protection from illegal activities and reporting to competent authorities."
		SPM	NA	As stated, Italian plantations are established only on agricultural land rather than forest land, so any illegal logging, land use and fires will effectively only be on private agricultural land rather than in a forest area. Outside of forest areas, there is a stipulation in the description (ITA 1004 2.1) that all relevant legislation and regulation is complied with, which in this case covers a significant number of laws and regulations applicable to agricultural operations.

**PART IV: Standard and System Requirement Checklist for CERTIFICATION AND ACCREDITATION PROCEDURES (Annex 6)**

Please note that a checklist for this section was not provided by PEFC Italy.

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
<b>Certification Bodies</b>	Y		
1. Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Y	Annex 1: 2.2.3	"Certification is carried out by CBs, third-party independent bodies, who are accredited by a national AB which is a member of the IAF – International Accreditation Forum (for example ACCREDIA in Italy) - for the certification of SFM and of the CoC of forest derived products which have been subsequently notified by PEFC Italy."
2. Does the scheme documentation require that certification body for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	Y	Annex 6: 2	The scheme documentation requires that certification may only be carried out by CBs accredited by organisations that are members of the IAF "in conformity with the norm EN 45011, ISO Guide 65 and PEFC (CoC and/or SFM – including SMPP) may deliver PEFC certification, with subsequent notification by PEFC Italy"
3. Does the scheme documentation require that certification body chain of	Y	Annex 6: 2	The scheme documentation requires that certification may only be carried out by CBs accredited by organisations that are members of the IAF "in conformity with the norm EN 45011, ISO Guide 65 and PEFC (CoC and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy"

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
custody certification against Annex 4 shall fulfil requirements defined in ISO Guide 65?			
4. Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Y	Annex 6: 2, 4.1	<p>The scheme documentation requires that certification may only be carried out by CBs accredited by organisations that are members of the IAF “in conformity with the norm EN 45011, ISO Guide 65 and PEFC (CoC and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy”.</p> <p>Scheme documentation also states that “In order to guarantee a reliable, accurate and efficient way to carry out the audits to evaluate the SFM and SPM, the audit personnel must possess at least the following fundamental skills:</p> <ul style="list-style-type: none"> <li>a) knowledge of PEFC-Italy documents on the certification scheme to be evaluated</li> <li>b) knowledge of the UNI EN ISO 19011 standard and thorough knowledge of the corresponding evaluation techniques and methods; and</li> <li>c) specific technical knowledge of the processes implemented in the field of the certification scheme being evaluated and sufficient knowledge of the relative products/services, including the applicable legislative provisions regarding the applicable sectors (qualification, e.g. diploma, degree etc.)</li> </ul> <p>The documentation also states that auditors must “have a degree in Forestry or a high school diploma in forestry (in the case of the SPM, a Degree in Agrarian Sciences is considered equivalent for the qualification of Auditor). If the certification is carried out by a single Auditor (AU), they must have a Degree in Forestry.”</p>
5. Does the scheme documentation require that certification bodies carrying out C-o-C certifications shall have technical competence in forest based products procurement and processing and material flows in different stages of processing and trading?	Y	Annex 6: 1	<p>“The certification body requirements for Chain of Custody follow the PEFC ST 2003:2012 (Second edition) document, therefore are not described in this document. It is available in Italian in document PEFC ITA 1003-2.”</p>
6. Does the scheme documentation require that	Y	Annex 6: 2, 4.1	<p>Scheme documentation states: “In order to guarantee a reliable, accurate and efficient way to carry out the audits to evaluate the SFM and SPM, the audit personnel must possess at least the following fundamental skills:</p>

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management or C-o-C certifications?			a) knowledge of PEFC-Italy documents on the certification scheme to be evaluated b) knowledge of the UNI EN ISO 19011 standard and thorough knowledge of the corresponding evaluation techniques and methods; and c) specific technical knowledge of the processes implemented in the field of the certification scheme being evaluated and sufficient knowledge of the relative products/services, including the applicable legislative provisions regarding the applicable sectors (qualification, e.g. diploma, degree etc.)
7. Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification?	Y	Annex 6: 4.1.1	The scheme documentation describes requirements for CBs regarding the competence and technical knowledge of their auditors via maintenance of qualifications via both continuous work and training. It places sole responsibility on the CB to ensure the qualifications of audit personnel.
8. Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Y	Annex 6: 4.1, 4.1.1	Scheme documentation states: "In order to guarantee a reliable, accurate and efficient way to carry out the audits to evaluate the SFM and SPM, the audit personnel must possess at least the following fundamental skills: a) knowledge of PEFC-Italy documents on the certification scheme to be evaluated b) knowledge of the UNI EN ISO 19011 standard and thorough knowledge of the corresponding evaluation techniques and methods; and c) specific technical knowledge of the processes implemented in the field of the certification scheme being evaluated and sufficient knowledge of the relative products/services, including the applicable legislative provisions regarding the applicable sectors (qualification, e.g. diploma, degree etc.) It also states that "auditors must satisfy the requirements described in points 7.2, 7.3, 7.4, 7.5 and 7.6 of ISO 19011:2003".
9. Does the scheme documentation include additional qualification	Y	Annex 6: 4.1.1, 4.2	"Basic work experience: the auditor must have worked at least three years in a technical capacity, either as an employee or freelance. This work must be connected with Forest Management (for example forestry, forest settlement, forestry pathologies and entomology, forestry economics and legislation, the uses of woodland,

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
requirements for auditors carrying out forest management or chain of custody audits? [*1]			hydraulic-forest systems, forest systems planning, etc.); and Specific training for the SFM/SPM PEFC scheme of at least 16 hours, as recognized by PEFC Italy.” In addition, scheme documentation requires that auditors utilise ‘technical experts’ in specific fields that must meet additional requirements: “a) previous work experience of at least 3 years, in duties connected with SFM or SPM; and b) demonstrated evidence that the EXP [technical expert/s] is still active or, in any event, is capable as regards the above duties.”
<b>Certification Procedures</b>	Y		
10. Does the scheme documentation require that certification bodies shall have established internal procedures for forest management and/or chain of custody certification?	Y	Annex 6: 4.1 ISO/IEC 17065: 8.6	Certification bodies are required to conform with inter alia ISO/IEC 17065; this norm establishes that organisations meeting this requirement must establish such internal procedures (chapter 8.6).
11. Does the scheme documentation require that applied certification procedures for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Y	Annex 6: 2	Scheme documentation states that accredited CBs must be accredited by “a member of the IAF (e.g. ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC”. This implies that the applied certification procedures are compatible.
12. Does the scheme documentation require that applied certification procedures for chain of custody certification	Y	Annex 6: 2	Scheme documentation states that accredited CBs must be accredited by “a member of the IAF (e.g. ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC”. This implies that the applied certification procedures are compatible.

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
against Annex 4 shall fulfil or be compatible with the requirements defined in ISO Guide 65?			
13. Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Y	Annex 6: 1, 3.1	Scheme documentation states that “audits are carried out in accordance with the Norm UNI EN ISO 19011.” For chain of custody audits, requirements follow PEFC ST 2003:2012
14. Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates?	Y	Annex 6: 3.4	Scheme documentation states that: The outcome of the decision shall be communicated to both the applicant and PEFC Italy as the certificate is issued, through the sending of the certificate (for PEFC Italy, it is sufficient to send the identifying data of the certificate holder).”
15. Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Y	Annex 6: 3.5	The scheme documentation states: “The CB must monitor the usage of the Logo issued to a CB, GR and RA. The control of the proper usage of the sub-licences issued by the GR and RA is a duty of licence holders themselves, who must verify that the Logo usage rules included in the contract are observed.”
16. Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Y	Annex 6: 3.6.1	The scheme documentation states: “The CB must conduct surveillance audits in order to verify that the SFM/SPM system remain in conformity with the requirements of the Italian PEFC certification scheme. These surveillance audits occur at least once a year from the date of certification.”

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
17. Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?	Y	Annex 6: 3.6.2	Scheme documentation states: "Prior to the end of the certificate's five (5) year validity period, a certification renewal audit is carried out."
18. Does the scheme documentation include requirements for public availability of certification report summaries?	Y	Annex 6: 3.2.1	Scheme documentation states that "The CB must provide an audit summary (whose minimum contents are included in Appendix 2), which must be validated by the certifying organisation and sent to PEFC Italy within a month of the communication on the certification/surveillance; this audit summary must be made available to the public by the certified entity, and must be easily available and traceable (via PEFC Italy web site or in any other manner decided by the certified entity)."
19. Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Y	Annex 1: 2.2.1.1 (q), 2.2.1.2 (q), 2.2.1.3 (n)	Group entities (both GR and TA) are required to organise meetings with "interested parties", which are also referred to as "public consultations" in the scheme documentation. The documentation states that "The information gathered during public consultations (through any means, be it written, video or audio) must be conserved and used as documented evidence during the audit by the CB."
20. Does the scheme documentation include additional requirements for certification procedures? [*1]	Y	Annex 6: 3.2	The scheme documentation procedure includes additional requirements related to sampling procedures.
<b>Accreditation Procedures</b>			
21. Does the scheme documentation require that certification bodies carrying out forest management and/or chain of custody certification shall be accredited by a national	Y	Annex 1: 2.2.3	Scheme documentation states that: "Certification is carried out by CBs, third-party independent bodies, who are accredited by a national AB which is a member of the IAF – International Accreditation Forum (for example ACCREDIA in Italy) - for the certification of SFM and of the CoC of forest derived products which have been subsequently notified by PEFC Italy."

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
accreditation body?			
22. Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Y	Annex 6: 3.4	Scheme documentation states that “every issued certificate must include information on the national accreditation body (including the accreditation number for the CB and the accreditation symbol of the AB and of the CB).”
23. Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF's special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	Y	Annex 6: 2	Scheme documentation states: “Only CBs accredited by a national accreditation organisation that is a member of the IAF (e.g.ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC (and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy.”
24. Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be	Y	Annex 6: 2	Scheme documentation states: “Only CBs accredited by a national accreditation organisation that is a member of the IAF (e.g.ACCREDIA in Italy) in conformity with the norm EN 45011, ISO/IEC 17065 and PEFC (and/or SFM – including SPM) may deliver PEFC certification, with subsequent notification by PEFC Italy.”

Question	Y/N	Reference to scheme documentation	Assessment / Consultant's analysis
covered by the accreditation scope?			
25. Does the scheme documentation require that certification body undertake chain of custody certification against Annex 4 as "accredited certification" based on ISO Guide 65?	Y	Annex 6: 1	"The certification body requirements for Chain of Custody follow the PEFC ST 2003:2012."
26. Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Y	Annex 6: 2	Scheme documentation states: "notification is granted following presentation of the request using the specific and fully compiled form provided by PEFC Italy and a copy of a valid and updated accreditation certificate."
27. Are the procedures for PEFC notification of certification bodies non-discriminatory?	Y	Annex 6: 2	Scheme documentation states: "PEFC Italy's notification process is non-discriminatory allowing all CBs access to the PEFC Italian certification scheme."

## Appendix 4. Panel of Experts Review

### Assessment Report

- PEFC Italy Scheme for Sustainable Forest Management and Sustainable Plantation Management

Panel of Experts member - *Stefan Czamutjian*

### General Statement on report quality

Clear, neat and straight report.  
The findings in the report should also be addressed in the respective Annex.

### Specific findings

Report chapter / page	PoE member	Consultant's report statement	PoE member finding	Consultant's response
Exec. Summary / 7	Cz	3: The group certification models used by PIS to certify eligible forest owners conform to PEFC's requirements, as stipulated in <i>Group Forest Management Certification - requirements</i> (PEFC ST 1002: 2010), including:	The statement about the conformity is missing (conforms / partly conforms ...). Please add.	Agree. Statement has been added.
Exec. Summary / 7	Cz	4: PEFC Italy has adopted and translated into Italian PEFC ST 2002:2013	An explanation is missing for „PEFC ST 2002:2013“ (which standard is it?). The statement about the conformity is missing. Please add.	Agree. Explanation has been added.
4.2.2 / 35	Cz	5.3.5.: <b>Evidence:</b> The Standard requires that harvesting (wood and non-wood) not exceed a rate that cannot be sustained, ... with long-term forest management planning, and specifying that benefits should not decrease, and that yield is measured.	The requirement is about the way of harvesting operations (tending, damage to standing trees and soil) and not about the harvesting level. The level is addressed in requirement 5.3.6.  The references are different to those given in	Agreed. The evidence has been adjusted accordingly and the references have been corrected.

			the Annex.  Please add and outline the respective references.	
4.2.2 / 42	Cz	5.6.5, 5.6.6., 5.6.7: ... not applicable or appropriate.	Standard References: please add “not applicable” with SPM	‘Not applicable’ has been added
5.1 / 47	Cz	However, it should be noted that the requirements for Applicants for GR (2.2.1.2) contains an incorrect reference to TA, rather than GR.	How relevant is this fact for the implementation of the standard? Should a minor non-conformity be considered?	This is not relevant to the implementation of the standard and nor does it affect the implementation of the standard. The Consultant does not consider this to be a minor non-conformity.
5.2 / 47	Cz	Where relevant, separate assessments have been provided for IMG and Regional State Group certification.	<u>IMG and Regional State Group certification</u> are new terms which have not yet been mentioned or explained in the report. Please explain these terms.	Agreed. These were drafting errors.
7.2.1 / 56	Cz	Requ: 3.1. <b>Consultant’s Assessment: Not Applicable</b>	Why “not applicable”? Should this be replaced by “conforms”?	
7.2.1 / 56	Cz	Requ. 3.2. b) demonstrated evidence that the EXP is still active	Please explain EXP - has not yet been mentioned or explained in the report.	The abbreviation has been explained in the report.

#### Editorial comments

Report chapter / page	PoE member	Consultant’s report statement	PoE member editorial comment	Consultant’s response
3.2.1 / 13	Cz	Requ. 4.3:  Process: Evidence for <u>these process in</u> provided in Annex 12.	Should it read (?): Process: Evidence for <u>this process is</u> provided in Annex 12.	Correction made.
3.2.1 / 16	Cz	Evidence: ..... ( <u>Ann 1 2.2.2.4</u> ).	Should read: Annex	Correction made.
3.2.1 / 17	Cz	The FWG reviewed the 175 sets of comments received from consultations with the FWG in <u>this period. associated</u> with revision of	Full stop / syntax	Correction made.

		Standard.		
3.2.1 / 18	Cz	d) API Standard Setting Procedures require for the enquiry draft <u>the</u> “the public consultation is for at least 60 days,”	I guess “the” shall be replaced by “that”	Correction made.
4.2.2 / 26	Cz	Requ. 5.1.2: Management plans must management objectives, methods for undertaking silvicultural operations, planning, maintaining inventories. and "management practices which have a social value."	Please check syntax and grammar.	Sentence has been corrected.
4.2.2 / 31	Cz	However, both European Union and Italian both forbid any non-organic waste disposal altogether.	I think the second “both” should be eliminated (?).	Sentence has been corrected.
4.2.2 / 35	Cz	5.4.1: Evidence: .... biodiversity, native and introduced species with the overall objective of <u>enahncing the former</u> , biodiversity at ....	What does that mean? Please correct.	The quote has been corrected.
4.2.2 / 38	Cz	Requ. 5.4.9.: The Standard does addresses traditional management systems ...	Should read: The Standard addresses traditional management systems ...	The sentence has been corrected.
5.2.1 / 52	Cz	Arrange, update ... to faciliate <u>vokuntary</u>	Must read: voluntary	Spelling error has been corrected.
Annex / 74	Cz	5.3 a: API has provided evidence that the processes are consistent with <u>teh</u> requirement in Annex 12.1	Should read “the”	Spelling error has been corrected.
	Cz	Requ. 5.4.9.: The Standard does addresses traditional management systems ...	Should read: The Standard addresses traditional management systems ...	Error has been corrected.
Annex / 120	Cz	9: b) demonstrated evidence that the EXP is still active	Please explain EXP -	The abbreviation has been explained.

**Assessment Report - Review of “Conformity assessment of the “PEFC Italy Scheme for Sustainable Forest Management and Sustainable Plantation Management” against PEFC Council Requirements” (ITS Global)**

Panel of Experts member - Hannu Valtanen

**General Statement on report quality**

The report seems to be prepared in a great hurry. There are plenty of typos; the contents of various chapters are not very consistent etc. Normally the basic evidence for a requirement is provided in the assessment report and more evidence introduced in annex of the report. Often the report begins with a rather substantial summary, where the basic findings of the scheme are already reported. This kind of a structure makes reading easier and gives the reader an opportunity to check the consultant’s assessments (“conforms – does not conform”).

This assessment report does not give required information to the reader to consider whether the assessor has done “fair conclusions” when assessing the scheme. Most, if not all, evidences referred by the assessor are not available.

**Specific findings**

Report chapter / page	PoE member	Consultant’s report statement	PoE member finding	Consultant’s response
Contents pp. 4-5	HVa	Page numbering	errors in page numbering: 24-125	Content page numbering has been corrected.
Acronyms p. 6	HVa	List of acronyms	At least the following acronyms used in the report are missing: SPM, FWG, ISRP, AALSEA, PEFCI, PICS, UNDRIP, AB, SD	Missing acronyms have been added.
Executive Summary p. 7	HVa	Summary of the Findings 1. a) – c)	The list of resolved non-conformities I not informative; it raises more questions than gives answer: were there plenty of them? How critical they were? Non-conformities identified in the report are mentioned only in the executive summary!	These have been briefly explained in the executive summary; The Consultant does not consider them to be critical as they were easily resolved via the consultation process and additional process documentation plus legislative references.
Executive Summary p. 7	HVa	3....Certify eligible forest owners 3. C)...of certified forest owners	I suppose PEFC certifies forests, not forest owners	Agreed, this would refer to ‘owners of certified forests’; a correction has been made.
Executive Summary p. 7	HVa	4. ....PEFC ST 2002:2013	It helps the reader, if the name of the document is mentioned, as well.	The name of the document has been added.

Executive Summary p. 7	HVa	5....as detailed in Annex 6. Certification and...	The report has only 4 annexes. (?)	Agreed. The distinction between the Annexes of the Application material (i.e. the Standards) and the Annexes of the report were not distinguished in the draft report. Subsequently to avoid this confusion the Consultants have altered the report's Annexes to Appendices and included specific page number referencing for the Appendix.
1.2 p. 8	HVa	....PEFCC's requirements..... ....PEFC's requirements....	choice should be made	Choice made, i.e. PEFC.
p. 9 or 10	HVa	proposed new chapter	It would be very informative, shortly to explain the PEFC certification history in Italy: the first endorsed scheme etc. and probably short introduction of Italian forest sector.	A chapter section has been added.
2.1 p. 10	HVa			
2.1 p. 10	HVa	Although a TA and a GR are defined differently in the Scheme Documentation, the requirements for both as Applicants are essentially the same, with some very minor differences.	I did not find any definitions to find real differences between these two groups. Some more words needed for this!	A clearer explanation has been added to the report.
2.2 p. 10	HVa	Annexes 1-13	The content of the annexes should be available somewhere- otherwise the assessment report is worthless	Please see comments below and above; the referencing system was obviously not clear; it has subsequently been reorganized with a clearer referencing system.
3. pp12-22	HVa	General comment	The most important issue in the standard setting process may be "the balanced presentation of various stakeholders in the standard setting WG". In this report I cannot find the list of the members of the WG and their backgrounds. I also miss well-structured reporting in this chapter: each requirement shall be handled in a similar "standardized" way! Evidence shall be presented here so that the reader can judge the consultant's assessment conclusion! The simplest way is to copy the corresponding text of	The list of stakeholders has been added.  The Consultant agrees with the comment and has subsequently reorganized the referencing system accordingly.

			the Italian document, or shorten it, but put the full text in appendix! It does not help the reader when there are plenty of references. like Annex 1 Appendix 1A1 or Annex 1 Appendix 1B1 (p. 12)	
3.2.1 p. 13	HVa	Requirement 4.2 Evidence: Process Requirement 4.3 Evidence: Process:	No evidence provided, nor in Annex No evidence provided, nor in Annex	Evidence has been added.
3.2.1 p. 14	HVa	Requirement 4.4 Evidence: Process	No evidence provided, nor in Annex	Evidence has been added.
3.2.2 p. 15	HVa	Requirement 5.2	There should be “procedures” and “process” assessed – and evidence given	Noted and corrected.
3.2.2 pp. 15-16	HVa	Requirement 5.3	This requirement is handled correctly: “procedure” and “process” plus evidence presented ☺	Thank you.
3.2.2 p. 17	HVa	Requirement 5.4 Evidence: Requirement 5.5 Evidence:	Here the first chapter refers “procedures” and econd “Process” – presentation should be standardized	Presentation has been standardized.
3.2.2 p. 17-18	HVa	Requirement 5.6	On page 18 the text is totally unstructured! Evidence? Procedure? Process? Point a) second chapter: no evidence of “timely manner” -> non-conformity? Point d) second chapter: The period I only 46 days, requirement wa 60 days -> nnon-conformity?	Text has been restructured. The confusion around the dates was because of a drafting error between June and July.
3.2.2 p.20	HVa	There appears to have been lack of opposition to the approval and therefore consensus; responses received were positive.	This wording is not very strong evidence for consensus!	Evidence has been added accordingly.
3.2.2 p. 20	HVa	The 2010-2015 Standard approved by 4th November 2015 was publicly released on 4th November 2009 via Press Release and API’s Website (Annex 12.1).	I do not understand these dates! The appendix on p. 83 says: “The evidence provided indicates that the requirement was met.” – but no evidence is shown!	Dates have been corrected.
4. pp. 23-45	HVa	General comment	he structure of the chapter could be more “standardized”. There are two standards (natural forests, plantation forests) Each requirement could be handled in a similar way 1. natural, 2, plantation. Evidence shall be there presented	The chapters have been standardized accordingly.

			twice under each requirement – now it is missing in most requirements!	
4.2.1 p. 24	HVa	Decreto Legislativo 18 maggio 2001, n. 227 "Orientamento e modernizzazione del settore forestale, a norma dell'articolo 7 della legge 5 marzo 2001, n. 57" pubblicato nella Gazzetta Ufficiale n. 137 del 15 giugno 2001 - Supplemento Ordinario n. 149	This reference does not increase the understanding of the issue for non-Italian reader. Why not another Annex/appendix – number instead ☺	The explanation has been expanded; a section has been added at the beginning of the document of key pieces of Italian legislation.
4.2.1 p. 24	HVa	Requirement 4.1 b) Evidence	No evidence provided, nor in annex	Evidence has been added.
4.2.1 p. 25	HVa	Requirement 4.1 c) Evidence Standard References: Annex 1 – 2.2.1 (2.2.1.1.1 e – 2.2.1.2.1 e – 2.2.1.3 f)	No evidence provided, nor in annex I do not understand for whom this info is preented?	Evidence has been added.
4.2.1 pp. 25-29	HVa	contents of the “Evidence” –parts and lists of “Standard References”	These pages do not give very reliable impression of the Italian SFM standard – nor the assessment process, there should be more written evidence!	Written evidence has been added accordingly.
4.2.1 p. 31	HVa	Requirement 5.2.9 and 5.2.10	These are important requirements and that is why there must be evidence presented!	More information has been added.
p. 32	HVa	Evidence: The SFM Standard does not specify this requirement.	But should it specify in order to be in conformance?	This sentence has been removed as it may have provided some confusion with the remainder of the paragraph.
pp. 37-44	HVa	Evidence!	Proper evidence is missing all the time – it is not enough to refer appendix and annex numbers which are not available!	Evidence has been added.
5. p. 47	HVa	TA certification is the process by which groups of forest owners are audited and certified by an accredited certification body under a single third-party issued certificate. A TA is a group entity recognised by PEFC Italy as representing more than 50 per cent of planned forests in a particular region; there may be only one TA per region. The requirements for TA seeking certification are evaluated for each TA (group organizational level). The TA is responsible for	For me it is very difficult to understand the differences between these two organisations. Some clarification urgently needed. (This and below)	A clarification has been added.

		ensuring that operations are consistent with PIS requirements. Each forest owner who is a member of TA must demonstrate conformity to ITA 1001-1 as a minimum and to ITA 1001-2 (Annex 3).		
5. p. 47	HVa	GR certification is the process by which groups of forest owners are audited and certified by an accredited certification body under a single third-party issued certificate. A GR is a group entity recognised by PEFC Italy that is an aggregate of forest owners and/or managers. The requirements for a GR seeking certification are evaluated for each GR (group organizational level). The GR is responsible for ensuring that operations are consistent with PIS requirements. Each forest owner or manager who is a member of a GR must demonstrate conformity to ITA 1001-1 and/or ITA 1004-1.	For me it is very difficult to understand the differences between these two organisations. Some clarification urgently needed. (This and above)	A clarification has been added.
5. p. 47	HVa	However, it should be noted that the requirements for Applicants for GR (2.2.1.2) contains an incorrect reference to TA, rather than GR.	Probably I am right that there is not much difference ☺	Noted.
p. 47-53	HVa	Evidence	No evidence provided!!! nor pp. 85-86 There are only few places where the consultant has put some words as evidence!!	Evidence has been added.
6. p.54	HVa		The consultant may add here some words. If I have understand it right, PEFC Italy ha adopted the PEFC CoC standard to be part of the Italian PEFC system.	Text has been added to clarify this.
7. pp.55-63	HVa	Content of the chapter	The content of this chapter is good, I like it. In certain requirement chapters dealing with CoC-standard the consultant’s assessment is “not applicable”. I would like to see the reason	There are three points at which ‘not applicable’ is used in the assessments. In two of these cases, it is because the standard refers to “follow[ing] the PEFC ST 2003:2012”, and in both cases it

			written down, why it is not applicable – that makes it more understandable.	would be more appropriate to refer to these as conformities. Similarly, the other point refers to conformity with ‘EN 45011, ISO/IEC 17065 and PEFC’. Again, it would make more sense for this to be referred to as a conformity.

**Assessment Report - PEFC Italy, Sustainable Forest Management and Sustainable Plantation Management**  
**Panel of Experts member - Hugh Miller**

**General Statement on report quality**

This report does not present the sort of evidence we have come to expect. Thus, there are few details about those invited to participate in the process and the make-up of the working groups, and while the questions for the Stakeholder survey are given there are no details of who they were sent to, who responded and the nature of the responses. All too frequently the Consultants simply assert that the Standard “is consistent with”, or “addresses” a particular requirement without giving appropriate quotes from the Standard, Guidelines, Indicators or applicable legislation. This makes it difficult to come to a judgement. It also seems that all too frequently PEFC requirements are dismissed as not being appropriate to fast growing plantations on farm land without giving any explanation (sometimes there may be relevant agricultural regulations but we are not given the enough details).

**Specific findings**

Report chapter / page	PoE member	Consultant’s report statement	PoE member finding	Consultant’s response
P15 ST1001:2 010 5.1	HGM	“The standardising body shall identify stakeholders relevant to the objectives and scope of the standard setting work” “In its application ASPI has provided evidence the invitees were distributed to a representative cross section of stakeholders.”	PoE members would normally be shown details of who, or which categories, were invited, who responded and who participated. This information is useful in coming to a judgement	The list has been added.
p16 & p79 d)	HGM	In 4 <sup>th</sup> bullet point under Evidence it is stated that “Pre-revision public consultation was announced on July 2 2015” but no final date is given. In the table on p79 under point d) it is stated that “consultation period was July2 to August 17 2015”	July 2 to August 17 is not 60 days, is one of the quoted dates wrong?	The quoted dates were incorrect and have been amended; the error was that it was June rather than July.
p26 PEFC ST2003:2 010 5.1.2	HGM	PEFC requires a “cycle of inventory and planning...(that) shall include appropriate assessment of the social, environmental and economic aspects of forest management	No specific assertion that social impacts are covered. Perhaps the comments on p37 that planning “must aim to respect the multiple functions of forests to society...” could be	The referred to evidence has been quoted.

		operations.”	quoted here.	
P28, p29, p37, p38 and else where	HGM	The Consultants simply state that “the Standard is consistent with the requirements.”	I do not believe that this assertion is adequate, if the judgement is to be assessed more details need to be given including relevant quotes from the Standard or other documents.	The system of referencing has been organised completely such that references to the text in the appendix have been added by page number; additional quoted evidence has been added to the appendix accordingly.
p31 top para	HGM	“the spillage of oil during forest operations .. shall be strictly avoided”	Does the Italian Standard ever refer specifically to oil spillage?	Yes. The assessment has been corrected accordingly.
p38 top para	HGM	Under Evidence it is simply stated that “this is further addressed in a number of Operation Guidelines and Indicators”	If this is to be assessed we need details with quotes from these guidelines and indicators.	Details with quotes from the guidelines have been added accordingly.
p40 2 <sup>nd</sup> para and 3 <sup>rd</sup> last para	HGM	2 <sup>nd</sup> para under Evidence “..; it also specifically restricts operations in erosion prone areas” 3 <sup>rd</sup> last para “prohibits soil working in any context”	We seem to be getting conflicting statements here, what is the position regarding soil cultivation? Give more and fuller details with appropriate quotes from the Standard	More quotes have been added accordingly.
p40 ST1003:2 010 5.5.6	HGM	“The Standard requires forest management practice to prohibit use of pesticides and herbicides .. addresses the minimisation of drainage to water courses”	This is all rather general, over what area, or how far from stream banks, does the prohibition apply, what is meant by minimisation? More details required.	More details have been added.
p42 ST1003:2 010 5.6.5	HGM	“Plantations in Italy are only present or can only be established on agricultural land; public access in these instances is not applicable or appropriate”	Fast growing plantations on farm land do have some recreational value (walking, shooting etc.), on p114 it is stated that this is provided for under Italian legislation from 20 Feb 2006 covering Agritourism. What does this law stipulate? More details needed here.	To give greater details on the nature of and legislation governing plantations, more detail has been added throughout the report, including a quote from the laws governing agritourism.
p43 1003:201 0 5.6.7	HGM	“The plantation Standard does not establish an assessment parameter as this is not applicable to plantations that are only established on agricultural land”	Fast growing plantations on agricultural land exist in a landscape so have an aesthetic impact and a recreational potential. Are these covered anywhere?	Greater levels of detail on plantations in Italy have been added throughout the report.
p56 6,31	HGM	Consultants assessment given as “Not Applicable”	Surely the judgement should be “Conforms”	The judgement has been corrected accordingly.
p65	HGM	Annex 1 “comments Submitted to ITS Global during Stakeholder Survey	Although the questions are detailed we are not told who they were sent to nor shown the comments received back. These are	Full details have been added to the report in the Appendix.

			needed	
p74 5.3 a) b) c) Pp85 & 86 and else where	HGM	“The text is consistent with the requirements”	It probably is but the extent of the consistency should be shown with relevant quotes from the Standard or other documents.	Quotes have been added throughout the Appendix.
p95 & 96 5.1.1	HGM	Requirement to “enhance the quality of the economic, ecological, cultural and social values of forest resources” is judged NA for plantations	Surely farm forests have some values that can be enhanced – is this covered anywhere?	
p101 5.1.11	HGM	“SPM. Italian law RDL 3265/1923 prohibits the conversion of forest land to other uses.”	Does this stipulation cover plantations on agricultural land? If not can such plantations be covered by PEFC.	Considered. The consultants believe that this is ultimately a question for the PEFC BoD and the next round of revisions to the PEFC Standard. As has been noted in the report, PEFC has established a new working group on ‘Trees Outside the Forest’.  With regards to Italian legislation, the legislation includes the conversion of areas considered/defined as forests to agroforestry systems. The law, particularly 227/2001 is quite narrow in this regard and prevents clear-cutting of natural forest even when situated on agricultural land.
pp 102, 105, 107, 109 and else where	HGM	“consistent with requirements”	As mentioned above, there is a need to give quotes from the Standard, Guidelines, Indicators or legal requirement to show how and to what extent there is consistency with requirements.	Quotes have been added accordingly.
pp105 106 & else where	HGM	“addresses”	No doubt the Standard does address the requirement, but details with appropriate quotes need to be given.	Details have been added accordingly.

p107 5.4.4 15.2a	HGM	“This reference is not directly relevant”	Not clear what is meant by this	This was a drafting error; the reference has been removed.
p115 SPM	HGM	“largely consistent with requirements”	See above and what is meant by “largely”, is it consistent or is it not?	‘Largely’ has been removed.

**Editorial comments**

Report chapter / page	PoE member	Consultant’s report statement	PoE member editorial comment	Consultant’s response
Pp6 & 12	HGM	FWG	The abbreviation FWG for Forum Working Group is not in the list of abbreviations on p6	Added
P26 2 <sup>nd</sup> para line 4	HGM	“Management plans must management objectives, methods.”	Word missing.	Corrected
P31 2 <sup>nd</sup> para lines 2 & 3	HGM	“However, both European Union and Italian both forbid any non-organic waste disposal altogether”	Word missing and “both” repeated.	Corrected
P43 2010:5.6. 8	HGM	“Consisten”	Consistent	Corrected

