

September 2015

# PEFC Conformity Assessment

Polish PEFC Scheme





## Client

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## Acronyms

BoD	Board of Directors
CB	Certifying Body
CoC	Chain of Custody
GA	General Assembly
EA	European cooperation for Accreditation
EN	European Norm
IAF	International Accreditation Forum
IBL	Instytut Badawczy Leśnictwa (Polish Forest Research Institute)
IEC	International Electrotechnical Commission
IGD	Informative Guide / Guidance Document
ISO	International Standardization Organisation
N.A.	Not applicable
PCA	Polskie Centrum Akredytacji (Polish Centre for Accreditation)
PEFC	Programme for the Endorsement of Forest Certification
PEFCC	PEFC Council
PEFC GD	Guidance Document of PEFC International
PEFC PL	Standard Document as part of the Polish PEFC Scheme
PEFC ST	Standard Document of PEFC International
PN	Polish Norm
PoE	Panel of Experts
Req.	Requirement
SFM	Sustainable Forest Management
SSRC	Standard and Scheme Requirement Checklist
WG	Working Group



## 1. Introduction

With the Programme for Endorsement of Forest Certification schemes (PEFC), national standards for Sustainable Forest Management are brought under the umbrella organisation PEFC by endorsing the national standard after a positive evaluation. Every five years, the endorsed national schemes need to be revised after which an independent consultant assesses whether the revised scheme is in conformity with PEFC International's requirements.

This report presents the results of the evaluation of the Polish PEFC Scheme against PEFC International's requirements for forest certification schemes. The Polish PEFC Scheme was first endorsed by the PEFC Council (PEFCC) in 2008. The revision took place from February 2011 to December 2012. Additional work related to the establishment of remaining technical documents lasted until April 2014. The application for PEFC re-endorsement was submitted in May 2014. PEFCC appointed Form international (Form) as the independent consultant to carry out the assessment. This assessment report will be the basis for the PEFCC's decision, and provides a recommendation to the PEFC Board on the formal endorsement of the Polish PEFC Scheme for Sustainable Forest Management (SFM).

### 1.1. Form international

The assessment benefited from Form's specific experience and expertise in certification and SFM. Form has implemented many studies in which national or international certification standards were analysed versus another standard or scheme, for example for FSC and Keurhout. Moreover, Form has carried out conformity assessments for PEFC, such as the standards of Austria, Spain, Gabon, Czech Republic, Finland, Sweden, Canada, Switzerland, Ireland, Denmark, United Kingdom and Indonesia.

The conformity assessment team consisted of Rutger de Wolf and Christine Naaijen (Forestry Experts and registered assessors).

### 1.2. Scope of the assessment

The scope of this assessment is to assess the conformity of the Polish PEFC Scheme with the PEFC standards and system requirements as presented in PEFC IGD 1007-01:2012.

### 1.3. Documents and resources used

Various documents and resources were used in this conformity assessment. The documents received from PEFC Polska are shown in table 1.1. The latest version of these documents were used (ultimately August 2015), including changes made by PEFC Polska during the assessment period. Table 1.2 lists the documents used from



PEFCC. Besides these documents, the website of PEFC Polska ([www.pefc-polska.pl](http://www.pefc-polska.pl)) was consulted during the assessment.

*Table 1.1 Documents used for the conformity assessment*

#	Title
1	Scheme Description – The Polish PEFC Scheme
2	PEFC PL 1001:2012 Standard setting – Requirements
3	PEFC PL 1002:2013 Certification and accreditation procedures
4	PEFC PL 1003:2012 Sustainable forest management – Requirements
5	PEFC PL 1004:2012 Group forest management certification – Requirements
6	Procedure for PEFC Notification of Certification Bodies operating Forest Management System and/or Chain of Custody Certification in Poland
7	Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL)
8	Development Report – First Revision of the Polish PEFC Scheme
9	Other documentation and evidence of the standard setting process (records)
10	PEFC Standard and System Requirements Checklist elaborated by PEFC Polska
11	Act on Forests of September 28th 1991
12	Additional clarifications provided by PEFC Polska during the Assessment process
13	Bylaws of PEFC Polska

*Table 1.2 The PEFCC Technical documents used.*

#	PEFC Council document	Date
1	PEFC GD 1007:2012: Endorsement and Mutual Recognition of National Systems and their Revision	16 November 2012
2	PEFCC TD Annex 1: Terms and Definitions	27 October 2006
3	PEFCC TD Annex 6: Certification and Accreditation Procedures	5 October 2007
4	PEFCC TD Annex 7: Endorsement and Mutual Recognition of National Schemes and their Revisions	5 October 2007
6	PEFC ST 1001:2010 Standard Setting – Requirements	26 November 2010
7	PEFC ST 1002:2010 Group Forest Management Certification – Requirements	26 November 2010
5	PEFC ST 1003:2010 Sustainable Forest Management – Requirements	26 November 2010
8	PEFC ST 2001:2008 v2 PEFC Logo usage rules - Requirements	26 November 2010
9	PEFC ST 2002:2013 Chain of Custody of Forest Based Products - Requirements	24 May 2013
10	PEFC ST 2003:2012 Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard	16 July 2012
11	PEFC GD 1004:2009 Administration of PEFC scheme	5 October 2009
12	PEFC GD 1005:2012 Issuance of PEFC Logo Use Licenses by the PEFC Council	27 November 2012





#	PEFC Council document	Date
13	PEFC IGD 1007-01:2012 PEFC Standard and System Requirement Checklist	6 May 2014
14	PEFC IGD 1007-03:2012 The Assessment Report	16 November 2012
15	PEFC Secretariat's clarification concerning the content of the assessment report (clarification 30/10/12).	30 October 2012

#### 1.4. Methodology adopted

The work consisted of a desk study in which an evaluation of the conformity was conducted. The assessment enabled the consultant to identify any missing information, similarities and differences between the Polish PEFC Scheme and the PEFC standards and system requirements. Next to a general analysis of the structure of the scheme, the assessment consisted of:

##### a. Assessment of the standard setting procedures

This aspect is evaluated on the basis of PEFC ST 1001:2010 Standard Setting - Requirements. The checklist (part I of PEFC IGD 1007-01:2012) has been used to assess the compliance of the Polish PEFC Scheme with the demands of PEFC concerning the standard setting procedures and the actual process. The criteria for the standard setting procedure have been assessed in two stages:

1. compliance of the scheme documented procedures ('Procedures')
2. compliance of the standard setting process itself ('Process')

The documented procedures are required to govern the standard setting process and as such shall be in place before the standard setting process starts (Standard Setting Procedures). To assess the process, the Development report "First Revision of the Polish PEFC scheme" and results of stakeholder consultations are used to evaluate compliance of the process.

The PEFC conducted an international public consultation, and a stakeholder survey was held by Form international through questionnaires that were sent out to members of the Working Groups and other relevant stakeholders, as identified by PEFC Polska (most of them participated in the standard revision process).

##### b. Assessment of the sustainable forest management standard

The Polish PEFC Scheme compliance with PEFC ST 1003:2010 Sustainable Forest Management was assessed based on part III of PEFC IGD 1007-01:2012.

##### c. Assessment of the group certification procedures

The Polish PEFC Scheme compliance with PEFC ST 1002:2010, Group Forest Management Certification – Requirements was assessed based on part II of PEFC IGD 1007-01:2012.



**d. Assessment of the chain of custody standard**

The Polish PEFC Scheme compliance with PEFC ST 2002:2010 – Chain of Custody of Forest Based Products – Requirements was assessed based on part V of PEFC IGD 1007-01:2012.

**e. Assessment of the procedures for logo licensing**

The Polish PEFC Scheme compliance with PEFC GD 1004:2009 Administration of PEFC scheme chapter 6 was assessed based on part VI of PEFC IGD 1007-01:2012.

**f. Assessment of the complaints and dispute resolution procedures**

The Polish PEFC Scheme compliance with PEFC GD 1004:2009 Administration of PEFC scheme chapter 8 was assessed based on part VI of PEFC IGD 1007-01:2012.

**g. Assessment of the procedures for notification of certification bodies**

The Polish PEFC Scheme compliance with PEFC GD 1004:2009 Administration of PEFC scheme chapter 5 was assessed based on part VI of PEFC IGD 1007-01:2012.

**h. Assessment of the certification and accreditation procedures**

The Polish PEFC Scheme compliance with Annex 6 to the PEFC Council Technical Document (Certification and accreditation procedures) and PEFC ST 2003:2012 was assessed based on part IV of PEFC IGD 1007-01:2012.

**i. Other aspects regarding functions and efficiency of the scheme**

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

The report is written in line with the guidelines of the PEFC, PEFC GD 1007-03:2012 for the content of an assessment report, and the additional PEFC's clarification of 30 October 2012.

## 1.5. Assessment process

The assessment process consisted of the following steps:

### 1. Public consultation

The international public consultation was held from 16 July 2014 to 15 September 2014. Comments of the public were considered in the process and can be found in Annex 3.

The national stakeholder consultation was held from 30 September to 20 October 2014. Form sent out questionnaires to all stakeholders that were members of the two Working Groups and additional stakeholders that were invited and/or participated in public consultation meetings during the revision process. In total 85 questionnaires were sent out, 8 responses were received.



## **2. Technical desk study**

The technical desk study was carried out on the Polish PEFC Scheme documentation. It comprised of a review of the documentation and a verification of the standards and system requirements checklist. During the assessment additional information and translations were requested from PEFC Polska.

## **3. Elaboration of draft report**

The draft report was sent to PEFC Polska and PEFC on 4 November 2014.

## **4. Elaboration of final draft report**

Based on the draft report and the number of non-conformities found, PEFC Polska requested for an interruption. Based on the responses and additional references and clarifications to the draft report, a final draft report was developed and sent to PEFC Polska and PEFC on 4 March 2015. Due to the remaining issues, PEFC Polska requested for an additional interruption. Based on additional responses, changes and evidence, a second final draft report was developed and sent to PEFC on 17 July 2015.

## **5. Review of the final draft report**

Three members of PEFC's Panel of Experts, Mr. Hannu Valtanen, Mr. Stefan Czamutjian and Mr. Kent Gustafsson, contributed to the final report by providing Form with their feedback and comments. On August 18<sup>th</sup> 2015, PEFC sent through the comments from Panel of Experts members.

## **6. Final analysis and reporting**

This final report was elaborated taking into account the comments from Panel of Experts members and was sent to the PEFC on September 11<sup>th</sup> 2015.

### **1.6. Report structure**

Chapter 2 gives an explicit statement in the form of a recommendation whether or not the Board of Directors of PEFC should adopt the Polish PEFC Scheme. In chapter 3, a summary of the findings is presented. Chapter 4 gives an overview of the key structures of the scheme, followed by the results of the assessment of the standard setting procedures and process in chapter 5. The assessment of the forest management standard and group certification procedures are presented in chapters 6 and 7. The Chain of Custody standard is quickly touched in Chapter 8. The assessment of the scheme administration (respectively logo usage licensing, complaints and dispute resolution and notification of certification bodies) is presented in chapters 9, 10 and 11, followed by the assessment of certification and accreditation procedures in chapter 12. The standards and system requirements checklist is enclosed in Annex 1. Results of the stakeholder survey and international consultation are presented in respectively Annex 2 and Annex 3, and the Panel of Experts Comments is enclosed in Annex 4.



## 2. Recommendation

Based on the results of this conformity assessment, Form international recommends the PEFC Board of Directors **to re-endorse the Polish PEFC Scheme**, on the condition that the identified non-conformities in the procedures shall be corrected within six (6) months after re-endorsement. This concerns six (6) non-conformities in the Forest Management Standard and two (2) non-conformities in the Complaints and Dispute Resolution Procedures.

In relation to the standard-setting process, nine (9) non-conformities are found. In the opinion of the assessor, the non-conformities found in the process did not undermine or damage the standard revision process.



## 3. Summary of the Findings

### 3.1. Overall

The Polish PEFC Scheme is in general quite complete and clear and similarly structured as the PEFC documentation. There are however 8 non-conformities found in the procedures (6 in the Forest Management Standard and 2 in the Complaints and Dispute Resolution Procedures). The majority of the non-conformities can be addressed by more precise and complete formulation in the scheme documentation or by providing new evidence. There are furthermore 9 non-conformities found in the revision process.

No non-conformities are found in the Group Certification Procedures, Chain of Custody standard, the Logo Usage Licensing procedures, Notification of Certification Bodies Procedures and Certification and Accreditation Procedures. The following paragraphs present the general findings of each section.

### 3.2. Structure of the System

PEFC Polska was founded in 2003, and the first Polish PEFC scheme was endorsed in 2008. The PEFC Polska Council has two governing bodies (General Meeting of members and Board of Directors) and depending the need to address various tasks and issues, it sets up Working Groups.

Within the Polish PEFC scheme, there are four standards for operators (SFM standard, forest certification standard, CoC standard and PEFC Logo usage), one standard for Certifying Bodies (certification and accreditation procedures), and three procedural documents for the governance of the Polish PEFC Scheme (Standard Setting Procedures, Notification of CB's and Logo usage Licensing).

### 3.3. Standard Setting Procedures and Process

The standard setting is assessed in two stages: the compliance of the scheme documented procedures ('Procedures') and the compliance of the standard setting process itself ('Process').

The procedures on standard setting (PEFC PL 1001:2012) are in general quite well structured and comprehensive. A reference to PEFC ST 1001:2010 is included as being normative. As a consequence the Polish PEFC Scheme Standard Setting Procedures conform with the International PEFC requirements.

The process is described in the Development Report (First Revision of the Polish PEFC scheme), which is a quite complete, clearly structured document that gives a quick overview of the Polish forestry sector and the revision process. In general, the process was conducted according to the standard-setting procedures and the respondents of the stakeholder survey had no complaints about the process and their



possibilities to contribute to the revision process. However, the record keeping was often poor as records were too short and concise and therefore in cases did not contain the information needed to show conformity with the standard-setting procedures. In relation to the standard-setting process, 9 non-conformities are found, which relate to the following issues (all are classified as minor):

- Evidence on efforts to include private forest owners (req. 5.2);
- Information in the invitation letter about the scope and steps of the standard-setting process and its timetable (req. 5.3.a);
- Invitation to comment on scope and standard setting process (req. 5.3.d);
- Reference to standard setting procedures (req. 5.3.e);
- Establishment of working groups justifiable in relation to balanced representation and considering comments received from the public (req. 5.4);
- Evidence of subject of the comments, views from group members, their resolution and proposed changes (req. 5.5.c);
- Evidence of approval of standards, based on evidence of consensus reached in the working group (req. 5.11);
- Revision of standards within five years (req. 6.1);
- Application date of revised standards (req. 6.3).

Most of these non-conformities relate to insufficient evidence in records and documentation to show conformity. Records were often too concise. However, in the opinion of the assessor, the non-conformities found in the process did not undermine or damage the standard revision process. It would therefore not be adequate to redo the process based on the non-conformities found in the process.

### 3.4. Forest Management Standard

The Sustainable Forest Management standard (PEFC PL 1003:2012) is in general quite complete and follows the structure of the PEFC generic standard. Most criteria are further elaborated in subrequirements and/or guidance. In total 6 non-conformities are found, which relate to the following issues (all are classified as minor):

- The standard includes subrequirements which function (and use) is unclear. The standard does not notify if these are indicators and/or verifiers, nor does it provide guidance on how these additional requirements shall be read, interpreted and used (req. 4.1.b);
- Conversion of forests (req. 5.1.11):
  - public consultation is insufficiently ensured;
  - it is not ensured that conversion of forest shall only entail a small proportion of forest.
- Sustainable harvesting levels with due regard to nutrient off-take (req. 5.3.6);
- Protection and/or conservation of ecologically important areas (req. 5.4.2);
- Commercial exploitation of protected and endangered species (req. 5.4.3);
- Mapping of forests with protective functions (req. 5.5.2).



### 3.5. Group Certification Procedures

The Group Certification Procedures (PEFC PL 2004:2012) are clear, concise and the requirements for the group entity and participants are literally adopted from the PEFC ST 1002:2010. The procedures comply with the PEFC requirements, no non-conformities were found.

### 3.6. Chain of Custody Standard

The Polish PEFC Scheme uses the PEFC ST 2002:2010 procedures. No non-conformities were found in the Chain of Custody Standard.

### 3.7. Logo Licensing Procedures

All matters relating to the use of the PEFC logo in Poland are regulated under provisions of the PEFC ST 2001:2008 v2: PEFC Logo Usage Rules – Requirements. The Logo usage Licensing is regulated in the Guidelines of PEFC Polska, “Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL)”. The procedures comply with the PEFC requirements, no non-conformities were found.

### 3.8. Complaints and Dispute Resolution Procedures

Chapter 9 in PEFC PL 1002:2013 Certification and Accreditation Procedures contains the procedures for dealing with appeals, complaints and disputes, related to the certification process and to the governance and administration of the PEFC scheme. Two non-conformities were found, which are both classified as minor:

- The impartiality of the complaint evaluation is insufficiently ensured (req. 7b.);
- The complaint handling process is not formally communicated to the complainant (req. 7c.).

### 3.9. Notification of Certification Bodies Procedures

The Forest Research Institute (IBL) is the PEFC National Governing Body in Poland. The certification bodies have to apply to IBL to obtain the PEFC notification. The procedures governing the notification of certification bodies are the PEFC Polska Guidelines named “Procedure for PEFC Notification of Certification Bodies operating Forest Management System and/or Chain of Custody Certification in Poland”. The procedures comply with the PEFC requirements, no non-conformities are found.

### 3.10. Certification and Accreditation Procedures

The procedures comply with the PEFC requirements, no non-conformities are found.



## 4. Structure of the System of the Applicant Scheme

### 4.1. Introduction forest sector in Poland<sup>1</sup>

In total 29.3 % of total land area of Poland is covered with forest, including one of the remaining areas of primary forest in Europe. These forests are mainly (81.2 %) publicly owned. This includes forest areas under the National Forest Holding (the majority), National Parks, forests under management of the Agricultural Agency of the State Treasury, and municipal and urban forests. The ownership structure of forests in the post-war period remained almost unchanged. Small changes in forest ownership in post-war period result from afforestation initiatives.

The State Forests National Forest Holding (in short: State Forests) is an organization protecting, utilizing, and shaping Poland's forests for over eighty years. It manages publicly owned forests on behalf of the Polish State Treasury. State Forests operates on the principle of financial independence and is managed by the Director General of the National Forests. It consists of 17 regional directorates and 430 forest districts (figures from 31 December 2011).

The share of private forest ownership was 16.9 % in 1981, but has slightly increased during last three decades to 18.4 % in 2012, because of afforestation of privately owned lands. There are about 900,000 private forest owners in Poland. Privately owned forest areas are therefore highly fragmented and average size of such forest is 1.2 ha.

Since the endorsement of the Polish PEFC Scheme in 2008, 80 % of the country's forest area has been PEFC certified (7.3 million hectares). All these Polish forests are either certified as a group or as a region. The use of Group Certification is therefore of particular importance in Poland, both for publically and privately owned forests.

Currently, only publicly owned forests (as part of the State Forests National Holding) are certified, none of the privately owned forests are certified yet.

### 4.2. Organisation PEFC Polska

The Forest Research Institute of Poland, being a member of the PEFC Council, set up the PEFC Polska Council, bringing together organisations associated with forestry, wood processing, environmental protection, as well as forest managers and owners. PEFC Polska was founded in 2003, "to promote the principles of sustainable development in the forestry sector through the Polish forest certification system and review on a regular basis the Polish forest certification system operating in accordance with the legal system of the Republic of Poland and the rules laid down

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<sup>1</sup> The information from this paragraph is mostly derived from the "Scheme Description – The Polish PEFC Scheme" and information presented on the PEFC website [www.pefc.org](http://www.pefc.org).





by the PEFC Council based in Geneva.”<sup>2</sup> The first Polish PEFC scheme was endorsed in 2008.

The organization of the Polish PEFC Scheme is described in the Scheme description document of PEFC Polska:

“The PEFC Polska Council is an initiatory, opinion-giving and advisory body with regard to management of the Polish forest certification scheme within the framework of the PEFC. The PEFC Polska Council is a decision-making body with regard to definition and review of criteria and indicators of sustainable forest management and supply chain certification. With regard to definition of criteria and indicators of sustainable forest management and supply chain certification, the PEFC Polska Council is standalone and independent of its members and third parties.

The PEFC Polska Council may include organisations dealing with broadly understood forestry, woodworking or environmental protection, as well as forest managers and owners. Membership in the PEFC Polska Council is voluntary. Members of the Council receive no compensation for their involvement in the Council. The PEFC Polska Council's governing bodies are:

- General Meeting of members, divided into three chambers: forest management, woodworking and non-wood material processing industry and socio-scientific chambers.
- Board of Directors.<sup>3</sup>

The PEFC Polska Council accomplishes its objectives and performs its tasks in accordance with these Bylaws and relevant provisions of the PEFC as an international organisation. (...) The PEFC Polska Council's tasks are as follows:

- review on a regular basis the Polish forest certification system operating in accordance with the legal system of the Republic of Poland and the rules laid down by the PEFC Council based in Geneva.
- review on a regular basis criteria and indicators of sustainable forest management;
- approve training programmes for certification bodies and make sure these are implemented to a suitable level;
- co-operate with the Polish Centre for Accreditation (PCA) in evaluating competencies of certification bodies operating in the area of the Polish forest certification system;
- promote the PEFC forest certification system;
- provide certification bodies with binding interpretations of indicators and criteria of sustainable forest management;
- co-operate with other members of the PEFC Council and similar Polish and international organisations.”

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<sup>2</sup> Derived from: “Scheme Description – The Polish PEFC Scheme”

<sup>3</sup> According to the bylaws, the task of the Board of Directors is to organise the work of the Council.



Depending the need to address various tasks and issues, the Council sets up standing or ad hoc Working Groups.

### 4.3. The Polish PEFC Scheme

PEFC Polska developed several Procedural and Standard documents that are schematically presented in the figure below. No country specific standards for Chain of Custody and for PEFC Logo usage rules are developed, instead, the PEFC procedures PEFC ST 2002 and PEFC ST 2001 are used. In the case of any dispute, the prevailing language of the standards is Polish. For this assessment the English translations were assessed.

Standards for operators	Standards for certifying bodies	Scheme governance
<p><b>PEFC PL 1003</b> Sustainable forest management – Requirements</p>	<p><b>PEFC PL 1002</b> Certification and accreditation procedures</p>	<p><b>PEFC PL 1001</b> Standard setting – Requirements</p>
<p><b>PEFC PL 1004</b> Group forest management certification – Requirements</p>		<p>Notification Procedure for Certification Bodies Conducting PEFC certification of forest management and / or supply chain in Poland</p>
<p><b>PEFC ST 2002</b> Chain of Custody – Requirements</p>		<p>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL)</p>
<p><b>PEFC ST 2001</b> PEFC Logo usage rules – Requirements</p>		



## 5. Standard Setting Procedures and Process

This chapter presents the non-conformities and observations found in the Standard Setting Procedures and Process. There are 9 non-conformities found, all related to the process and classified as minor. The Standard and Scheme Requirement Checklist related to the Standard Setting Procedures and Process can be found in Annex 1 part I, which presents all the conformities, non-conformities and related references.

### 5.1. Analysis of the Procedures

The Standard Setting Procedures are regulated in PEFC PL 1001:2012, where Chapter 2 (Normative references) reads:

“The documents referenced below are indispensable for the application of this document. (...)

PEFC ST 1001:2010. Standard Setting – Requirements”

As a consequence the Polish PEFC Scheme Standard Setting Procedures conform with the International PEFC requirements. Nevertheless, the Polish PEFC Scheme elaborated a country specific standard, which was assessed during the current assessment. Due to the reference to the International Standard, no non-conformities are found. However, two observations<sup>4</sup> are made related to PEFC PL 1001:2012:

- In the following cases the PEFC PL 1001:2012 misses some elements compared to the PEFC ST 1001:2010. As the Polish PEFC Scheme refers to PEFC ST 1001:2010 as being indispensable, the below mentioned issues are covered and do not result in non-conformities. There is however a risk that in practice, these issues are overlooked if the PEFC PL 1001:2012 is used as a reference for organizing the standard revision:
  - The procedures in PEFC PL 1001:2012 do not specify that the invitation to disadvantaged and key stakeholders shall be made in a manner to ensure that the information reaches the intended recipients and in a format that is understandable (req. 5.3.c);
  - The procedures in PEFC PL 1001:2012 do not specify when the revised standards shall be published and made publicly available (req. 5.12);
- The wording ‘timely manner in suitable media’ is relatively vague. It should be noted that this wording (used in the PEFC International procedures) needs further specification for the national (Polish) context, either in the procedures or during the process (req. 5.6.a).

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<sup>4</sup> It shall be noted that observations are issues / weaknesses found in the Polish PEFC Scheme that need the attention of PEFC Polska, but do not result in a non-conformity in relation to PEFC International’s requirements. Observations are therefore not linked to specific requirements, and corrective action requests are not applicable in the context of the current assessment.



## 5.2. Analysis of the Process

The Development Report (First Revision of the Polish PEFC scheme) is a quite complete, clearly structured document that gives a quick overview of the Polish forestry sector and the revision process. The report does not contain specific references to records and/or minutes. In general, the process was conducted according to the standard-setting procedures and the respondents of the stakeholder survey had no complaints about the process and their possibilities to contribute. However, the record keeping was often poor as records were too short and concise and therefore in cases did not contain the information needed to show conformity with the standard-setting procedures. In total, 9 non-conformities were found, largely due to insufficient evidence. These are mainly related to the involvement of disadvantaged stakeholders, invitation letters' content, minutes providing the evidence of certain requirements, the revision periods and period between publication and application date. In the opinion of the assessor, the non-conformities found in the process did not undermine or damage the standard revision process. It would therefore not be adequate to redo the process based on the non-conformities found in the process.

Next, three observations are made:

- The dates of the meetings of WG 1 provided in the Revision report do not exactly correspond with the dates on the minutes themselves. For example: Minutes of the first meeting are dated 12/04/2012 instead of 16/04/2012; Minutes of the second meeting are dated 12/05/2012 instead of 11/05/2012;
- The number of people present during meetings, according to the minutes, differs strongly from the total number of group members. Working Group 1 had 36 members. During the first meeting, 20 members participated. During the second meeting only 11 members participated. During the third meeting 18 members participated and during the fourth meeting 42 people participated, who cannot all be group members. It is not clear how the Working Group dealt with the absence of group members when voting needed to be done. Also, it is not clear which additional people were invited for the last (fourth) meeting;
- It is remarkable that the PEFC Polska Council had a voting, to formally approve the final version of the SFM standard, while consensus in the Working Groups was already reached, proven by earlier votings (WG1- 31 October 2012; WG2 – 15 June 2012).

## 5.3. Results: Non-conformities

Below, the non-conformities are presented. They start with the requirement (text in a block), followed by references providing the evidence for conformity with the requirement (normal and/or bold text), clarification by the consultant (italic text) and closed with a statement on the conformity (underlined text).



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.

**Process; First Revision of the Polish PEFC scheme, chapter 4.1:**

“The PEFC Polska identified disadvantaged stakeholder: private forest owners. In Poland private forests are very fragmented and poorly managed. Private forest owners are very poor represented in the forest sector (the most of private forest associations established with support of Environment Ministry are not active). The PEFC Polska did it’s best to incorporate private forest owners to revision of the PEFC National Standard (...). Despite of special means to involve private forest owners in the process, the PEFC Polska’s efforts failed. Private forest owners’ associations did not answer to announcements and invitations sent by post, electronic and phone calls. For this reason the PEFC Polska paid special attention to represent the private forest owner’s interests in the process.”

**Additional explanation provided by PEFC Polska:**

“The ownership structure of forests in Poland is very specific. Public forests dominate (82%), private forests are slightly above 16%. In addition, private forests are highly fragmented - the average private forest is about 1 hectare, which means more than a million owners, most of whom are not interested at all in forest management. Private forest owners are very reluctant to associate, which is, in a sense, a remnant of the past political system. Practically in the whole country there are only a dozen or so associations and only a few of them operate actively. PEFC Poland undertook various attempts to involve private forest owners in the work on the revision of the scheme contacting them by phone and e-mail (if available) as well as surface mail - practically with no results. In the case of letters a part of them has not been open by the recipients and returned to the office of PEFC Poland.”

*PEFC Polska explained that they sought the participation of private forest owners’ associations (including web-searches for addresses, phone calls and invitation letters) and listed several associations that were invited. However, insufficient references in records are found providing the evidence. Without this evidence it is difficult to verify whether these activities were sufficient to seek the private forest owners’ participation.*

Does not conform – minor



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,

**Process; Invitation letter, dd 8th of February 2012:**

“The General Assembly of PEFC Polska on February 9, 2011 decided to set up working groups: for revision of forest management standard and for the establishment of standards. One of the basic assumptions of the recognition of criteria and certification in PEFC scheme is to ensure the participation in the process of all legal entities and individuals interested in forestry, nature conservation and sustainable development. Therefore, the invitation is addressed to you to actively participate in the planned works. Over the next month we are waiting for appointments of people who will be your representatives in working groups.”

*In the invitation letter no information was found about the scope and steps of the standard-setting process and its timetable.*

Does not conform – minor

5.3 The announcement and invitation shall include;

d) an invitation to comment on the scope and the standard-setting process,

**Process; First Revision of the Polish PEFC scheme, chapter 4.1:**

“On the 8th of February 2012, PEFC Polska announced and invited for participation in process of revision on its website (...) and by announcements published in forest media (Las Polski) and on State Forests’ website. The announcement included:

- an invitation to comment on the scope and the standard-setting process”

**Invitation letter, dd 8th of February 2012:**

“[...] Therefore, the invitation is addressed to you to actively participate in the planned works.”

*No reference is found that the letter included an invitation to comment on the scope and the standard-setting process.*

Does not conform – minor



5.3 The announcement and invitation shall include  
e) reference to publicly available standard-setting procedures.

**Process**

*The invitation did not include a reference to standard-setting procedures and where they could be found.*

Does not conform – minor

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.

**Process; First Revision of the Polish PEFC scheme, Chapter 4:**

“4.1. Start of the revision process

On February 2011 PEFC Polska has initiated the first revision of the PEFC National Standard (...) At the same time revision of standard setting procedure was launched.

4.2. The appointment of working group

All nominated representatives of stakeholders were included in the working groups. The PEFC Polska appointed the working groups at their first meeting on the 16th of April 2012, basing on nominations received from invited stakeholders. All the participants were informed of the date of the meeting by e-mail. It was decided at the meeting that working group 1 will work on revision of forest management standard while working group 2 on revision of the technical documents.”

**Additional explanation provided by PEFC Polska:**

“The decisions of the Board had not formally been confirmed in the form of formal documents, just working groups have started acting. The PEFC Council in a formal vote on the final version of the standard formally confirmed the legality of the whole process of revision and the establishment of working groups. The acceptance of all nominees was (...) done. Every WG member had equal ability to participate in WG. There was not a one voice concern or objections on the legality of the action taken (in the process and in the stakeholders survey).”

*Although no reference was found (e.g. minutes of Board of Directors meeting) providing evidence that PEFC Polska **formally established** the working groups, it is clear from other records (minutes Working Groups, voting results) that the Working Groups were operative.*



*However, no reference was found that the acceptance of nominations was considered justifiable in relation to the requirements for balanced representation. It should be noted that at that time the procedures still included a clause which obliged PEFC Polska to accept all nominees.*

*According to PEFC Polska, no comments were received on the standard-setting procedures. However, no evidence was found in minutes that provide this evidence (e.g. clauses that refer to this outcome).*

Does not conform – minor

5.5 The work of the working group/committee shall be organised in an open and transparent manner where  
c) comments and views submitted by any member of the working group/committee shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded

**Process; First Revision of the Polish PEFC scheme, chapter 4.3:**

“WG 1: (...) The working group activities were recorded. The working group had four meetings (16/04/2012, 11/05/2012, 14-15/06/2012, 22-23/10/2012). In the open and transparent process the working group elaborated the draft the of the PEFC National Standard

WG 2: (...) The group had three joint meetings (16/04/2012, 11/05/2012, 14-15/06/2012), using also electronic communication.”

**Minutes of the first meeting of WG 1:**

“At the conclusion the working group agreed that the chairman M. Kalinowski will introduce the agreed amendments to the text of the draft, and the member of the group will sent to the PEFC Poland Office comments and suggestions.”

**Minutes of the second meeting of WG 1:**

“The working group discussed the comments made by Ms. Ewa Referowską-Chodak (Polish Forest Society), Mr. Piotr Dubiel (private person), Mr. Krzysztof Flis (Coordination Center for Environmental Projects) and Mr. Maciej Gomułka (Regional State Forests Directorate Kraków), and also reported during the meeting, and prepared the consolidated version of the standard (criteria 1-5). (...)

At the end of the meeting the members of the group mandated M. Kalinowski (PEFC Poland office) to gather all the proposals and submit a consolidated text (criteria 6-7).”

**Minutes of the third meeting of WG1:**

“The Working Group considered the comments made by Mr. Hubert Kawalec (Forest District Legnica), Ms. Izabela Pigan (Forest Women's Association), Jerzy Bargiel (Regional State Forests Directorate Toruń), Jerzy Osiak (Association of Foresters and Wood Technologists - SITLID), Tomasz Międzyrzecki (Forest District Miękinia) and prof. Andrzej Lewandowski (Institute of Dendrology of the Polish Academy of Sciences).”





**Minutes of 2nd meeting of WG2 –dd 11 May 2012:**

“During the meeting work was concentrated on two documents:

1. Document: Standard Setting Process - Requirements

Ad 1 / Krzysztof Jodłowski discussed the various paragraphs in the document, applying to the text comments presented and discussed by the members of the working group. Members of the group asked Krzysztof Jodłowski to prepare unified version of the standard and send out to participants.”

*No evidence in records (e.g. minutes or tables such as developed for the public consultation comments) was found on the **subject** of the **comments and views** from group members, their **resolution and proposed changes**. It should however be noted that all respondents of the stakeholder survey confirmed that comments and views have been considered in an open and transparent way.*

Does not conform – minor

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

**Process; First Revision of the Polish PEFC scheme, chapter 4.5:**

“On 19<sup>th</sup> of December 2012 the PEFC Polska formally approved the final version of PEFC National Standard “Sustainable forest management – requirements”.”

**Additional explanation provided by PEFC Polska:**

“The formal approval of the standard took place during a teleconference of the Board of Directors of PEFC Poland, organized by the Chairman, Krzysztof Jodłowski, on 19th December 2012. The Chairman presented the results of the work WG 1 and asked for formal approval of the standard. Information on formal approval was published on PEFC website.”

*Voting results for the forest management standard (records of the balloting, dd 5th of December 2012) show that there were 27 positive votes, 3 abstentions and no votes against the approval.*

*Although voting records of the Council were found, no record was found (e.g. minutes of the Council) providing evidence that the revised sustainable forest management standard was formally approved and that this approval was based on evidence of consensus reached by the working group.*

*Observation: It is remarkable that the PEFC Polska Council had a voting, while consensus in the Working Groups was already reached, proven by earlier votings (WG1- 31 October 2012; WG2 – 15 June 2012).*

Does not conform – minor



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

### Process

*Publication dates of the previous standard versions:*

- *Certification and Accreditation procedures: February 2005 (revised in 2011)*
- *Sustainable Forest Management standard: February 2005 (revised in July 2007)*
- *Standard-setting procedures: 2002 (revised in 2010)*
- *Notification of Certification Bodies procedures: 2009*
- *Group certification procedures: February 2005*

*The publication dates of the former versions of different scheme elements vary from 2002 to 2011. The revision intervals of almost all procedures exceeded the five-year period. In case of the forest management standard (July 2007 – Dec 2012) it took over 5 years.*

Does not conform – minor

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; Scheme Description – The Polish PEFC Scheme, chapter 10:

“New certificates issued after the [ insert date of endorsement by PEFC Council ] should be issued according to the revised standards.”

*The publication date of the SFM standard is December 2012 (approval by PEFC Polska Council). Application date will be on the date of endorsement by PEFC. This means that currently two years have passed since the publication date.*

Does not conform – minor

### 5.4. Results: Selection of conformities:

Below, a selection of conformities is presented that to the opinion of the assessment team are sensitive issues for the Polish context and/or illustrative examples of the Standard Setting Procedures and Process. They start with the requirement (text in a block), followed by references providing the evidence for conformity with the requirement (normal and/or bold text), clarification by the consultant (italic text) and closed with a statement on the conformity (underlined text).



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; PEFC PL 1001:2012:**

“4.1.3. Revisions of the standard-setting procedures within the PEFC scheme are made by the PEFC Polska through a working group appointed by PEFC Polska. A periodic revision of the standard-setting procedures is conducted every five years. The process of revising the standard setting procedures shall begin at least one and a half year before five-year period ends.

4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. The invitation includes:

- e) an invitation to comment on the scope and the standard-setting process, and
- f) reference to publicly available standard-setting procedures (at PEFC Polska website).

4.2.7. The PEFC Polska reviews the standard-setting process based on comments received from public consultations.

4.7.3. The formally approved/revised standards shall be published and made publicly available.”

*Although not explicitly stated, it is assumed that 4.7.3 does also apply for the standard-setting procedures, based on 4.1.3 and the following chapters in the procedures and references such as 4.2.5.f.*

Does conform

**Process; First Revision of the Polish PEFC scheme:**

“4 Revision Process

On February 2011 PEFC Polska has initiated the first revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management for forest certification. According to the decision of the board, the works on the revision of the system were to be conducted in two working groups. At the same time revision of standard setting procedure was launched.

On the 8th of February 2012, PEFC Polska announced and invited for participation in process of revision on its website (...) and by announcements published in forest media (...) and on State Forests' website.

The announcement included:

- information about the objectives, scope and the steps of the standard-setting process,
- an invitation to comment on the scope and the standard-setting process,



- the invitation to stakeholders to nominate their representative(s) to the working group.”

*Working Group 2 was in charge of the revision of the Standard Setting Procedures and minutes show that comments (submitted by stakeholders participating in this working group) were discussed and in cases also adopted.*

Does conform

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

**Process; First Revision of the Polish PEFC scheme:**

“3.2. Working Group 1

The PEFC Polska established the temporary working group responsible for revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management for forest certification) based on received nominations.

3.3. Working Group 2

Working Group 2 consisted of stakeholders interested in working on technical documents PEFC Polska, which were outside the scope of interest of the Working Group 1.

4.1. Start of revision process

On February 2011 PEFC Polska has initiated the first revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management for forest certification. According to the decision of the board, the works on the revision of the system were to be conducted in two working groups.”

*Although no reference was found (e.g. minutes of Board of Directors meeting) providing evidence that PEFC Polska formally established the working groups, it is clear from other records (minutes Working Groups, voting results) that the Working Groups were operative.*

Does conform



4.4 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

**Process; First Revision of the Polish PEFC scheme:**

“4.2. The appointment of working group

All nominated representatives of stakeholders were included in the working groups.”

*An overview of the number of persons per category per working group is presented in the table below (made by the assessor, derived from the Revision Report).*

Stakeholder category	WG1	WG2
Forest owner / manager (state)	21	13
Forest owner / manager (private)	0	0
Public administration	1	0
Forest / wood related industry	1	0
NGO's	7	2
Forest Science	1	1
Private person	1	0
<b>Total</b>	<b>32</b>	<b>16</b>

**Additional explanation provided by PEFC Polska:**

“The Board PEFC made all efforts to involve representatives of the private forests to working groups, sending letters of invitation to ten private forest owners associations (contact details are only addresses, no e-mails, no phone numbers). The letters were returned with the notation "addressee unknown".

Two active associations, the Polish Union of Associations of Forestry and the Association of Zawoja were not interested in participating in the working groups. The Board PEFC have not the resources of persuasion to get them to actively participate in the revision process. Initiated by the Board PEFC Poland President of the Polish Union of Associations of Forestry Władysław Pędziwiatr has issued the opinion (included with English translation).

It should also be noted that although we found private forest owners as an interested party (stakeholder), but currently there is no prospect of certification of private forest holdings in Poland. Certainly, such prospects will not appear at the time of the new standard. Private forest holdings (rather small plots, in fact an average of 1,5 ha) are very fragmented and private forest owners are no interested in forest certification.”

*Although no evidence (e.g. minutes of Board of Directors meeting) was found that all nominated representatives of stakeholders have been formally included in the working groups, other records (list of Working Group members, minutes) provide sufficient evidence that the working group included materially and directly affected stakeholders.*



*All nominated representatives were included in the Working Groups (no refusals) and all categories were represented, except the private forest owners. PEFC Polska explained that in total eleven private forest owners' associations were identified and invited to participate in the revision process. None of them participated or responded to the invitation. Results of the stakeholder survey do not indicate unbalanced representation.*

Does conform

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,

**Process; First Revision of the Polish PEFC scheme, chapter 4.3:**

“WG 1: (...) Working drafts and any other documents were available to all working group members. They were provided to contribute to working group activities. (...). The working group had four meetings (16/04/2012, 11/05/2012, 14-15/06/2012, 22-23/10/2012).

WG 2: The working group has reviewed the remaining documents included in the PEFC Polska scheme. The group had three joint meetings (16/04/2012, 11/05/2012, 14-15/06/2012), using also electronic communication.”

*Invitations (E-mails) were found for the WG meetings, which included working drafts. Respondents of the stakeholder survey confirmed that working drafts were available to working group members.*

Does conform

5.5 The work of the working group/committee shall be organised in an open and transparent manner where:

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

**Process; First Revision of the Polish PEFC scheme, chapter 4.3:**

“WG 1: In the open and transparent process the working group elaborated the draft the of the PEFC National Standard “Sustainable forest management – requirements”.

WG 2: The working group has reviewed the remaining documents included in the PEFC Polska scheme. The group had three joint meetings (...), using also electronic communication.”



**Minutes of the first meeting of WG 1:**

“At the conclusion the working group agreed (...) the member of the group will sent to the PEFC Poland Office comments and suggestions.”

**Minutes of the second meeting of WG 1:**

“The working group discussed the comments made by Ms. Ewa Referowską-Chodak (Polish Forest Society), Mr. Piotr Dubiel (private person), Mr. Krzysztof Flis (Coordination Center for Environmental Projects) and Mr. Maciej Gomułka (Regional State Forests Directorate Kraków), and also reported during the meeting, and prepared the consolidated version of the standard (criteria 1-5). (...)

At the end of the meeting the members of the group mandated M. Kalinowski (PEFC Poland office) to gather all the proposals and submit a consolidated text (criteria 6-7).”

**Minutes of the third meeting of WG1:**

“The Working Group considered the comments made by Mr. Hubert Kawalec (Forest District Legnica), Ms. Izabela Pigan (Forest Women's Association), Jerzy Bargiel (Regional State Forests Directorate Toruń), Jerzy Osiak (Association of Foresters and Wood Technologists - SITLID), Tomasz Międzyrzecki (Forest District Miękinia) and prof. Andrzej Lewandowski (Institute of Dendrology of the Polish Academy of Sciences).”

*All respondents of the stakeholder survey confirmed that they were provided with meaningful opportunities to contribute to the revision process and to submit comments.*

Does conform

<p>5.6 The standardising body shall organise a public consultation on the enquiry draft and shall ensure that:</p> <ul style="list-style-type: none"><li>a) the start and the end of the public consultation is announced in a timely manner in suitable media, (...)</li><li>e) all comments received are considered by the working group/committee in an objective manner,</li></ul>
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**Process; First Revision of the Polish PEFC scheme: Chapter 4**

“The PEFC Polska organised public consultation on the draft elaborated by working group. The beginning and the end of consultation was announced in forest periodicals, on the PEFC Polska’s website (...), and by emails. The special attention was paid to disadvantaged stakeholders – private forest owners.”



**Additional explanation provided by PEFC Polska:**

“Public consultations were announced on PEFC Polska and State Forests websites and in ‘Głos Lasu’ (summer edition, published in the beginning of July 2012), forest magazine focused at people interested in forest and forestry”

**Minutes of the fourth meeting of WG 1 – dd 22 and 23 October 2012:**

“The Working Group considered more than 170 comments and proposals made to the preliminary draft of the national PEFC Standard: Sustainable forest management – requirements, adopting part of them (whole or in part), part of them – rejecting, and part considering unfounded”

*Next to the announcements on websites and in the forest journal, Invitations were sent by E-mail to many stakeholders. The website announcement and invitation letter for public consultation are dated 12th of July 2012, which is the same day as the start of the consultation period. Since the date is not later than the start of the consultation period, the start and end date are considered to be announced in a timely manner.*

*The complete list of 170 comments was found. It included per comment the decision of the working group to (partly) reject or adopt the comments. Respondents of the stakeholder survey all confirmed that the comments were considered by the working group in an objective manner.*

Does conform

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.
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**Process; First Revision of the Polish PEFC scheme, chapter 4:**

“Finally, the working group recommended final draft of the PEFC National Standard “Sustainable forest management – requirements” using internet voting.”

**Minutes of the fourth meeting of WG 1:**

“The working group has prepared and adopted the final version of the document National Standard PEFC: Sustainable forest management – requirements (ready to vote in the Council PEFC Poland).”

*Voting results for the forest management standard (records of the balloting, dated 31 October 2012) show that there were 24 positive votes, 2 abstentions and no votes against the approval.*

**Minutes of the third meeting of WG 2:**

“Then there was voting on the documents developed by the working group. Documents: Group Forest Certification - requirements and Certification and Accreditation Procedures were adopted unanimously. In the case of the Standard





setting process - requirements, due to its importance, Internet voting was used. The vote was attended by 12 people - 11 votes in favor and one against.”

Does conform

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

a) a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,

**Process; Minutes of the third meeting of WG 2 (14/15 of June, 2012):**

“Then there was voting on the documents developed by the working group. Documents: Group Forest Certification - requirements and Certification and Accreditation Procedures were adopted unanimously.”

Does conform



## 6. Forest Management Standard

This chapter presents the findings of the assessment of the Sustainable Forest Management Standard. In total 6 non-conformities are found, all classified as minor. Corrective action requests are formulated for each of the non-conformities raised. The Standard and Scheme Requirement Checklist related to the Sustainable Forest Management Standard can be found in Annex 1 part III, which presents all the conformities, non-conformities and related references.

### 6.1. Analysis

The Sustainable Forest Management standard (PEFC PL 1003:2012) is in general quite complete and follows the structure of the PEFC generic standard. Criteria are clear, clearly structured, and most of the criteria are in conformity with the requirements. However, most criteria are further elaborated in subrequirements (that could be read as indicators, verifiers and/or guidance). The wording of these subrequirements is often (but not always) presented in question form. They mostly do not provide thresholds and/or prescribe what would be in compliance and what not, and therefore the function (and use) is unclear. Some subrequirements are more elaborated (and prescriptive) than others, and the approach is variable. The standard does not notify if these are indicators and/or verifiers, nor does it provide guidance on how these additional requirements shall be read, interpreted and used: as explanation, examples, or prescribed indicators/verifiers.

As explained by PEFC Polska, Poland has legislation that meets many of the requirements. According to PEFC Polska there is no need to duplicate certain issues in the standard. The assessor agrees that as long as national legislation fully complies with the international PEFC requirements, it is not required to include specific references in the national standard. Therefore the assessor used both references to the standard and references to national legislation to assess the conformity. However, in some cases (translated) national legislation or documents were not provided or no specific references to certain articles were made, which made it difficult for the assessor to assess the conformity.

In total 6 non-conformities are found, which are all classified as minor. The majority of the non-conformities can be addressed by more precise and complete formulation in the scheme documentation or by providing new evidence. Next, 6 observations are identified:

- The standard does not explicitly require record-keeping to provide evidence of compliance with the requirements of the forest management standard. The standard does often refer to specific records, however, it would be better if the standard requires record keeping as such to ensure a consistent maintenance and archiving of the relevant records for a longer timeframe;
- PEFC PL 1003:2012, criteria 4.1.5.: one of the brackets is missing;



- PEFC PL 1003:2012, criteria 4.1.5.: it is unclear to the assessor whether the forest management plans developed according to the requirements of national legislation (PEFC PL 1003:2012: criteria 4.1.3.) will include confidential information. The PEFC International requirement (PEFC ST 1003:2010 requirement 5.1.6) provides the opportunity to leave this information out. Such a provision is however not included in the Polish PEFC scheme. Implicitly it does not leave room to exclude confidential business or confidential information that is mentioned in the forest management plans, as the whole management plans shall be made publicly available according to criteria 4.1.5. There might be some conflict between Polish legislation on confidential information and the requirements of the Polish PEFC scheme;
- PEFC PL 1003:2012, criteria 4.1.9.: The word ‘and’ is missing at the end of a). Although grammatically not incorrect, leaving out the ‘and’ at the first bullet risks potential misinterpretation. Please note that PEFC explicitly adds the word ‘and’ at the end of each justification issue, because of the sensitivity of this requirement;
- PEFC PL 1003:2012, criteria 4.4.5.: the wording of first sentence (“shall be chosen”) excludes the choice for any other species. This contradicts with the second sentence;
- PEFC PL 1003:2012, criteria 4.7.1.: The wording is repetitive (“health, **health** and safety”). It is assumed that this must be “health, **labour** and safety”.

## 6.2. Results: Non-conformities

Below, the non-conformities are presented. They start with the requirement (text in a block), followed by references providing the evidence for conformity with the requirement (normal and/or bold text), clarification by the consultant (italic text) and closed with a statement on the conformity and a corrective action request (underlined text).

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

*The criteria are clear, objective-based and auditable. The additional requirements (subnotes A, B, C, etc.) are however confusing, as they do not put thresholds or state what is considered in compliance and what not and therefore the function (and use) is unclear. The standard does not notify if these are indicators and/or verifiers, nor does it provide guidance on how these additional requirements shall be read, interpreted and used: as explanation, examples, or prescribed indicators/verifiers.*

Some examples from **PEFC PL 1003:2012**:

- “4.1.5 A. Does the certified body make its forest management plan or its equivalent publicly available? Yes/No (the certified body provides proof of this).”



- “4.2.2 C. The area of tree stands damaged by insects in each of the past five years (ha).”
- “4.2.10 A. Does the certified body use the types of pesticides mentioned above? Yes/No.”
- “4.2.4 A. Does the periodic business plan of the certified body (or its equivalent) include the methods and means used to minimise damage to forest ecosystems? Yes/No (the certified entity shall submit appropriate records).”
- “4.4.1 H. List of forest basic material.”
- “4.6.11 B. Do persons carrying out tasks in forest operations comply with health and safety at work principles?”

**Additional explanation provided by PEFC Polska:**

“The purpose of the indicators, elaborated by working group, is to clarify or expand them [*Assessor: criteria*]. (...) We do not put restrictions against CB in the implementation of additional indicators.”

*This shall however be clear to all readers of the standard, no such reference was found in the standard.*

*To the opinion of the assessor, the absence of guidance on these additional requirements does not support the standard as it adds more confusion and risks the misinterpretation of how these requirements shall be used.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard

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.

**PEFC PL 1003:2012:**

“4.1.9. Conversion of forests to other types of land use shall not occur unless in justified circumstances, where the conversion:

- a) is in compliance with publicly consulted national and regional policies and Polish legislation on land use and forest management;



b) does not have significant negative effects on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and

c) contributes to long-term conservation, economic, and social benefits.”

**Additional explanation provided by PEFC Polska:**

“the law on access to information on the environment and its protection, public participation in environmental protection and environmental impact assessment (Dz. U. 2013. Poz. 1235), and Environmental Protection Act are applied. Defined in the first act the term "operation" means, inter alia, "any interference in the environment related to transformation or change of use of the site." Any such “operation”, likely to have significant effects on the environment, is subject to a mandatory assessment and evaluation, also subjected to the general public.

(...) If the primary forests are forests in nature reserves, national parks and landscape parks and Natura 2000 sites, the rules are even more restrictive.”

“According to this definition [the definition of primary forest in PEFC ST 1003:2010], all primary forests are in nature reserves and national parks in Poland.

**Act on the protection of nature (2004), no. 92, item 880:**

“Art 15.1. In national parks and nature reserves forbidden is: (...) 6) the use, destruction, willful damage, pollution and changing natural objects, sites and resources, and wildlife components; (...)

9) destroy of the soil or change of the intended use and/or use of land;”

*Two issues are found:*

- *Although PEFC Polska refers to applicable legislation in relation to public consultation in relation to conversion of forest, these references were not provided and could therefore not be assessed.*
- *No reference was found that in justified circumstances the conversion shall (only) entail a small proportion of forest type, appropriate to the Polish context.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard

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.
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**PEFC PL 1003:2012:**

“4.3.6. Harvesting levels of both wood and non-wood forest products shall ensure sustainability in the long term, and optimum use shall be made of the harvested forest products.”



**Additional explanation provided by PEFC Polska:**

“The working group has just simplified this standard, and its sense remained unchanged. The term "sustainability" means also – keeping nutrient balance.

However, a lot of forest management rules, established in forest legal framework, is related to the determination of the size of harvesting so as not to disturb the forest ecosystem (including the minimum size of clearcuts).”

*No reference was found that the optimum use shall be made **with due regard to nutrient off-take**. It should be noted that the nutrient off-take might easily be overlooked by either forest managers or Certifying Bodies. PEFC Polska provided several references of legislation, these however referred to protection of soil and water and did not notify nutrient off-take.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard

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

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

**PEFC PL 1003:2012:**

“4.4.2. Inventorying forest resources shall take into account ecologically important forest areas (including areas set aside for nature conservation) containing significant concentrations of:

- a. protected, rare, sensitive or representative forest ecosystems (especially wetland habitats) and ecotone zones;
- b. areas containing endemic species and habitats of endangered species, as defined in recognised reference lists;
- c. endangered or protected genetic in situ resources.

Planning forest management activities shall take into account the conservation of the valuable natural resources in the areas mentioned above.

(...) B. Are there instructions developed to preserve the above mentioned resources (plans/conservation activities, management guidelines)? Yes/No (if not, why – lack of such a need, beyond the competence of the certified body, etc.).



- C. Change in the area of forest included in the Natura 2000 network in the past five years (ha).
- D. Change in the area of forest nature reserves (including areas under strict protection) in the past five years (ha).
- E. Change in the area of forest included in protected landscape areas in the past five years (ha).
- F. Change in the area of forest landscape parks in the past five years (ha).
- G. Change in the area of forest nature-landscape areas in the past five years (ha).
- H. Change in the area of forest ecological use sites in the past five years (ha).
- I. Natural monuments (registry number and changes that have taken place with respect to natural monuments in the past five years).
- J. Change in the area of forest sites with documented non-living natural resources in the past five years (ha)."

**Additional explanation provided by PEFC Polska:**

"The working group has just simplified this standard, and its sense remained unchanged. The inventory is a broader concept and also means identifying and mapping."

"The Instruction of Forest Planning contains a detailed mandatory instruction of mapping of the ecologically important forest areas as follows:

"6.1.4. Overview map or situational-review map of protected areas and forest functions.

§ 73. 1. Overview map or situational-review map of protected areas and forest functions shall be based on a matrix of forest map (basically a scale of 1: 25 000), or a situation map area within the territorial scope of a forest district (basically a scale of 1: 50 000 ). Review or situational-review mapping of protected areas and functions is based on an appropriate addition inscriptions and signs, coloring borders and background of forest protected areas according to their functions, including:, including:

- 1) the boundaries of national parks and national parks buffer zones;
- 2) the boundaries of reserves, lagging reserves and planned reserves;
- 3) the boundaries of the Natura 2000 areas;
- 4) recognized borders (set by the regional directors of environmental protection documents and confirmed on the ground) of refuges, natural habitats and stands of plants or animals which are objects of protection, that have been assigned a Natura 2000 site; in the absence of data on the location of the object of protection in the area code is valid of designation of the subject of protection, relating to the whole designated Natura 2000;
- 5) the boundaries of protected forests with the distinction of leading category of protection;
- 6) the boundaries of parks and protected landscape areas and its buffer zones;



- 7) the boundaries or symbols: forest national monuments, ecological, geological points of interest, nature-landscape and surface forms of natural monuments;
- 8) symbol and the name of the forest promotion complexes, entered in the title of the map, the name of a forest district;
- 9) the boundaries or symbols: resorts, excluded seed stands and important natural and cultural peculiarities;
- 10) sets the boundaries or symbols stands for the same tasks protective designated for nature conservation program.”

*The wording “take into account the conservation of the valuable natural resources” does insufficiently ensure the (pro-active) **protection and/or conservation** of these areas.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard

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.

**PEFC PL 1003:2012:**

“4.4.3. Protected and endangered plant, animal and fungus species shall not be exploited in a manner that is against the law.

A. Does the eventual exploitation of protected and endangered species comply with the law? Yes/No (the certified body shall present its permits).”

**Additional explanation provided by PEFC Polska:**

“In this case the exploitation means the catch of individual animals for scientific purposes (only in very limited cases, after authorization by the relevant authorities). Polish law is very demanding when it comes to protecting protected and endangered species”

“Protected and endangered plant and animal species cannot be exploited for commercial purposes in Poland.

According to act of 16 April 2004 on the protection of nature (Journal of Laws 2004, no. 92, item 880):

Art. 117. 1. The management of resources of wild plants, animals and fungi and genetic resources of plants, animals and fungi utilised by man should provide their durability, optimum size and conservation of genetic diversity, in particular by:

- 1) the protection, maintenance and rational use of natural and semi-natural ecosystems, including forests, bogs, marshes, grasslands, salt marshes, coastal cliffs and dunes, line the banks of the waters of river valleys, sources and springs, as well as rivers, lakes and marine areas, and habitats as well as refuges of plants, animals and fungi;





2) creating the conditions for the propagation and spread of endangered plants, animals and fungi, and protecting and restoring natural habitats and refuges, as well as the protection of animal migration routes.”

*The PEFC requirement does not allow for exceptions, even not when national legislation allows for exceptions. The references insufficiently ensure that protected and endangered species shall never be exploited for commercial purposes.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard

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.
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**PEFC PL 1003:2012:**

“4.5.2. Protection forests shall be inventoried and forest management plans (or their equivalents) shall take full account of these areas.”

**Additional explanation provided by PEFC Polska:**

“In the Polish forestry practice, the inventory also means mapping.”

*No reference was found that forests with protective functions shall be mapped. There are references found in relation to protected areas, these do however not refer to non-protected forests that have protective functions for society (such as steep hill forests that protect against landslides). Although mapping might work well in practice, this shall also be required by the standard.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard



### 6.3. Results: Selection of conformities

Below, a selection of conformities is presented that to the opinion of the assessment team are sensitive issues for the Polish context and/or illustrative examples of the Sustainable Forest Management Standard. They start with the requirement (text in a block), followed by references providing the evidence for conformity with the requirement (normal and/or bold text), clarification by the consultant (italic text) and closed with a statement on the conformity (underlined text).

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.

#### **PEFC PL 1003:2012:**

“4.1.3. Management plans (or their equivalents) shall be elaborated and periodically updated according to the requirements of national legislation.”

#### **The Act on Forests of September 28th 1991; Chapter 4:**

“Art. 18. 1. Subject to para. 2, a Forest Management Plan shall be drawn up for 10 years

2. Where the condition of forest so justifies, and most especially where damage or the impacts of natural disasters are present therein, a Forest Management Plan may be drawn up for a period shorter than 10 years.

4. A Forest Management Plan shall in particular contain:

- 1) a description of forests and of land designated for afforestation
- 2) an analysis of forest management in the elapsed period;
- 2a) a nature conservation programme;
- 3) a detailing of tasks, including in particular those concerning:
  - a) the amount of timber whose harvest is anticipated, as determined in relation to the volumes to be taken in the course of final and pre-final felling,
  - b) afforestation and restocking,
  - c) the tending and protection of forest, including protection against fire,
  - d) game management,
  - e) needs in respect of technological infrastructure.

Art. 19. 1. Subject to para. 2, a Forest Management Plan shall be drawn up for forests that constitute property of the Treasury.

2. Subject to paras. 3 and 4, a Simplified Forest Management Plan shall be drawn up for forests not constituting Treasury property, as well as for forests forming part of the Treasury Agricultural Property Resource.

3. In the case of fragmented forests with areas of up to 10 ha that do not constitute Treasury property, tasks as regards forest management are as set out in a Decision



of the Starosta heading a given powiat, on the basis of inventorying of the condition of the said forest.

4. Where fragmented forests with areas of up to 10 ha come within the aforesaid Treasury Agricultural Property Resource, tasks in respect of forest management on the basis of the inventorying of the condition of forests are determined by a District Forest Manager.”

**Additional explanation provided by PEFC Polska:**

“The national legislation ensures detailed coordination between all types of land-use plans: forest management plans (or their equivalents), Natura 2000 plans, zoning (spatial management) plans etc. In short, the most important acts are Forest Act and Spatial Planning Act (Dz.U. 2003 No. 80, item. 717).”

“According to the regulation of the Ministry of the Environment of 12 November 2012 on the specific conditions and procedures for the preparation of the management plan, simplified management plan and inventory of the forest:

§ 1. 1. In preparing the management plan, a simplified management plan and inventory of the forest must be taken into account: (...)

5) planned in the local legislative acts way of management of forest and its surroundings”

Does conform

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.

**PEFC PL 1003:2012:**

“4.1.4. Management plans (or their equivalents) shall include at least: a description of the state of the forest at the time of planning, long- and medium-term objectives, and the average allowable cut during the time of the plan’s duration.

4.3.6. Harvesting levels of both wood and non-wood forest products shall ensure sustainability in the long term”

**Act on Forest of September 28th 1991; Chapter 1, article 6:**

“9) the “prescribed cut” [PEFC Polska translation: Allowable cut] means the amount of wood to be harvested set out in a Forest Management Plan or Simplified Forest Management Plan, as this arises out of the need to renew, tend and protect forest, as well as the principles of forest sustainability and continuity of utilisation;”

**Act on Forest of September 28th 1991; Chapter 2, article 13:**

“1. Forest owners shall be obliged to ensure the permanent maintenance of forest cover, as well as continuity of utilisation, and in particular:

5) to make rational use of forests in a manner permanently ensuring optimal discharge of all the functions thereof, by means of:



- a) the harvesting of wood within limits not exceeding a forest's productive capabilities,
- b) the harvesting of raw materials and by-products of forest use, in a manner providing for biological renewal, and also ensuring protection of forest-floor vegetation.”

**Act on Forest of September 28th 1991; Chapter 5:**

“Art. 27. 1. Subject to the prohibitions provided for in Arts. 26 and 30, forests constituting Treasury property shall be made available for the gathering and picking of forest-floor produce:

- 1) to meet persons' own needs;
  - 2) for industrial purposes, subject to paras. 2 and 3.
2. The gathering and picking of forest-floor produce for industrial purposes shall require the concluding of an agreement with the given Forest District.
3. District Forest Managers shall decline to conclude an agreement of the said kind where gathering from the forest floor poses a threat to the forest environment.

Art. 30. 1. In forests, it shall be forbidden:

- 4) to destroy fungi or fungal mycelia;
- 5) to destroy or damage trees, shrubs or other plants;
- 7) to gather and pick the produce of the forest floor, where this activity is marked as prohibited;
- 8) to disturb or collect leaf litter;
- 11) to collect eggs or nestlings of birds or destroy their breeding grounds or nests, or to destroy the holes, dens, lairs and setts of animals, as well as anthills;
- 12) to scare, chase, catch, trap and/or kill wild animals;”

**Act on Forest of September 28th 1991; article 18:**

“1. The management plan shall be made, subject to paragraph. 2, for 10 years, including:

- 1) natural and economic conditions of forest management;
- 2) the purposes and principles of forest management and ways of their implementation, defined for each stand and object, including protective forests.”

**Additional explanation provided by PEFC Polska:**

“The detailed rules for the calculation of annual cuts are included in the obligatory Instruction of forest planning. In general, the average annual cut is one-tenth of cuts specified in the plan (effective 10 years).”

*Elaborative clauses in the Forest Act on the calculation of the Annual Allowable Cut were found. Although the word 'annual' is missing in 4.1.4, the Polish legislation obliges to calculate the allowable cut over a period of ten years. From this figure, the average annual allowable cut can easily be derived.*

*Although no reference was found that the sustainable harvesting of non-timber forest products shall be included in the management plan, the assessor concluded that in*



*the Polish context the applicable legislation is sufficient to ensure the sustainable harvesting of non-timber forest products.*

Does conform

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.

**PEFC PL 1003:2012:**

“4.2.2. Health and vitality of forests shall be periodically monitored, especially key biotic, abiotic and anthropogenic factors that potentially affect the health and vitality of forest ecosystems.

A. Does the certified body monitor the threats mentioned above? Yes/No (the certified body shall present evidence of this).

B. The area of tree stands damaged by game animals in each of the past five years (ha).

C. The area of tree stands damaged by insects in each of the past five years (ha).

D. The area of tree stands damaged by fungi in each of the past five years (ha).

E. The area of tree stands damaged by fire in each of the past five years (ha).

F. The area of tree stands damaged by wind and other abiotic factors in each of the past five years (ha).”

Does conform

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.

**PEFC PL 1003:2012:**

“4.2.7. Appropriate forest management practices such as reforestation and afforestation with tree species suited to site conditions and the use of tending, harvesting and transport techniques that minimise tree and/or soil damage 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 collected and stored in designated areas and removed in an environmentally-responsible manner.”

Does conform

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.

**PEFC PL 1003:2012:**

“4.2.9. The use of pesticides containing active substances classified by the World Health Organization as Type 1A and 1B pesticides is allowed only in cases when the forest’s sustainability is threatened.”

**Additional explanation provided by PEFC Polska:**

“The very extensive reference in this case is obligatory in the State Forests Instruction of Forest Protection ([http://www.lasy.gov.pl/publikacje/copy\\_of\\_gospodarkalesna/ochrona\\_lasu/instrukcja-ochrony-lasu-tom-i](http://www.lasy.gov.pl/publikacje/copy_of_gospodarkalesna/ochrona_lasu/instrukcja-ochrony-lasu-tom-i)). The instruction extensively describes alternative/biological methods of forest protection and rules for their use.”

“Instruction of Forest Protection, obligatory in the State Forests, extensively describes alternative/biological methods of forest protection and rules for their use.

The State Forests Instruction of Forest Protection says that:

“Activities in the field of forest protection include: [...]

c) the use of environmentally friendly techniques and technologies, not causing damage to the soil, vegetation, animal biotopes, etc .;

d) the restriction (limitation) of chemical control methods for biological, mechanical and biotechnical methods;

(...) f) the use of focal-complex method of forest protection, especially in areas of outbreaks of leaf-eating insects.”

Does conform

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.

**PEFC PL 1003:2012:**

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

Does conform



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.

**PEFC PL 1003:2012:**

“4.4.5. For reforestation and afforestation, native species and local ecotypes that are welladapted to habitat conditions shall be chosen. The only foreign species that can be introduced into the environment are those which are not listed in Polish law as endangering native species and habitats.

Note: The Convention on Biological Diversity Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as the required guidance for avoidance of invasive species.”

*Observation: the wording of first sentence (“shall be chosen”) excludes the choice for any other species. This contradicts with the second sentence.*

Does conform

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

**PEFC PL 1003:2012:**

“4.4.9. When justified and in compliance with current law, traditional management practices that have created valuable ecosystems shall be supported on appropriate sites.”

Does conform

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.

**PEFC PL 1003:2012:**

“4.4.12. With due regard to management objectives and legal requirements, measures shall be taken to limit excessive pressure of game animal populations endangering forest regeneration and growth as well as on biodiversity.”

Does conform



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.

**PEFC PL 1003:2012:**

“4.5.3. Special care shall be given to silvicultural operations on soils and in areas prone to erosion. Proper measures shall be taken to prepare the soil.

4.4.12. With due regard to management objectives and legal requirements, measures shall be taken to limit excessive pressure of game animal populations endangering forest regeneration and growth”

Does conform

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.

**PEFC PL 1003:2012:**

“4.6.3. Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, customary and traditional use of the given forest area shall be respected in accordance with current law.”

*PEFC Polska furthermore explained that there are no formally recognized customary and traditional rights related to the forest land in Poland. “Public forests are open with some restrictions, e.g. people are not allowed to set fire (except camping places) or collect wood for home use.”*

*As the issues outlined in ILO 169 and UN Declaration on the Rights of Indigenous Peoples are not applicable in Poland, it is concluded that the specific PEFC requirements to these issues are not applicable for the Polish PEFC Scheme.*

Does conform





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.

**PEFC PL 1003:2012:**

“4.6.6. Forest management operations shall take into account all socio-economic functions, especially the recreational function and the aesthetic values of forests by maintaining, for example, varied forest structures. This shall be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources.”

Does conform

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

**PEFC PL 1003:2012:**

“4.6.9. Forest management activities of the certified body shall provide education, as well as effective communication and consultation with local people and other stakeholders on sustainable forest management. Appropriate mechanisms shall be provided for responding to complaints and resolving disputes relating to forest management between forest managers and local people.”

Does conform

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.

**PEFC PL 1003:2012:**

“4.6.11. Working conditions shall be safe, and training in health and safety at work shall be provided to all those assigned to a task in forest operations.”

Does conform



## 7. Group Certification Procedures

This chapter presents the findings of the assessment of the Group Forest Management Certification Procedures. No non-conformities are found. The Standard and Scheme Requirement Checklist related to the Group Forest Management Certification can be found in Annex 1 part II, which presents all the conformities and related references.

### 7.1. Analysis

For the Group Certification Procedures, PEFC Polska refers to PEFC PL 1004:2012: Group Forest Management Certification - Requirements. The Procedures are clear, concise and the requirements for the group entity and participants are literally adopted from the PEFC ST 1002:2010. One observation is identified:

- Clause 4.1 does contain two lists that are both starting with a). For referencing this might be confusing.

The Scheme does allow that the group organization consists of associations of forest owners/managers, as long as the associations can demonstrate that it has a legal mandate to represent the participants and where the terms and conditions of the contract between the forest owners/managers and the association are enforceable. To the opinion of the assessment team, this option provides sufficient guarantee that the certification scheme is properly applied at management level, and that it is sufficiently enforceable.

### 7.2. Results

Below, a selection of conformities is presented that to the opinion of the assessment team are sensitive issues for the Polish context and/or illustrative examples of the Group Forest Management Certification. They start with the requirement (text in a block), followed by references providing the evidence for conformity with the requirement (normal and/or bold text) and eventual clarification by the consultant (italic text) and closed with a statement on the conformity (underlined text).

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.

#### **PEFC PL 1004:2012, 1.:**

“Group forest management certification requires establishing a specific management structure that includes the individual forest owners/managers. This entity represents the individual owners/managers in forest certification in order to ensure the correct implementation of the sustainable forest management standard and provide a sufficient level of confidence in sampling-based certification activities.”



**PEFC PL 1004:2012, 4.2.:**

“The following requirements for the function and responsibility of the group entity shall include:

- h) To operate an annual internal monitoring programme that provides for the assessment of participants’ conformity with certification requirements; and
- 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 assessments and surveillance; corrective and preventive measures if required; and the assessment of the effectiveness of corrective actions taken.

**PEFC PL 1004:2012, 4.3.:**

The participants of a group certification shall fulfil the following requirements:

- 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 PEFC Polska Forest 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;
- d) To implement relevant corrective and preventive actions established by the group entity.”

Does conform

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.
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**PEFC PL 1004:2012, 4.1.:**

“The group entity is responsible to develop and develop an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard. This internal monitoring programme shall include following elements:

- a) at the time of joining the group organization, individual participants shall undertake initial assessment against the sustainable forest management standard through an assessment by the group entity;
- b) the group entity shall carry out internal audit on at least 20% of the total number of participants with regard to their conformity with the sustainable forest management standard on an annual basis;
- c) the group entity shall ensure that the internal audit is carried out by competent personnel that is impartial to the audited participant;

d) the group entity shall evaluate the information about conformity of the participants to the sustainable forest management standard that is obtained from publicly available sources and other interested parties.”

**PEFC PL 1004:2012, 4.2.:**

“The following requirements for the function and responsibility of the group entity shall include:

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

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 assessments and surveillance; corrective and preventive measures if required; and the assessment of the effectiveness of corrective actions taken.”

**Additional explanation provided by PEFC Polska:**

"In the description of Polish forestry we have mentioned the ownership structure of forests in Poland, underlining domination of public forests. The State Forest National Forest Holding (SFNFH) administrates over 80 % of forests and SFNFH is the only forest administrating organization having PEFC certificates, group certificates. Since we have in Poland 17 regional directorates of State Forests, there are 17 group certificate. SFNFH has the same structure regardless the region of Poland (each regional directorate is divided into a number of forest districts) with built-in controlling bodies at the regional and central level. Each forest district is regularly audited by regional directorate (group entity). And no forest district is excluded from internal audit. So I would leave the statement in the standard as it is. Additionally, we never mentioned that monitoring should be carried out for the selected participants only."

Does conform



## 8. Chain of Custody Standard

According to the Scheme Description – The Polish PEFC Scheme, “Chain of custody certification is carried out according to international normative PEFC ST 2002:2013 Chain of Custody – Requirements.” Therefore no further assessment had to be carried out.



## 9. Logo Usage Licensing

This chapter presents the findings of the assessment of the Logo Licensing Procedures. No non-conformities are found. The Standard and Scheme Requirement Checklist related to the PEFC Logo usage licensing can be found in Annex 1 part VI, which presents all conformities and related references.

### 9.1. Analysis

All matters relating to the use of the PEFC logo in Poland are regulated under provisions of the PEFC ST 2001:2008 v2: PEFC Logo Usage Rules – Requirements. The Logo usage Licensing is regulated in the Guidelines of PEFC Polska, “Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL)”. The Forest Research Institute is the PEFC authorised body for the issuance of PEFC Logo Usage Licenses. The applicant submits an application form and required documents, to be assessed by the Chairman of PEFC Polska. If the opinion on the license issuance is negative, the applicant can appeal to the PEFC Polska Council Board. If the opinion is positive, the Forest Research Institute signs the relevant Logo Usage Contract. The applicant then pays a fee, after which the PEFC Polska Council Secretariat sends the PEFC Logo Reproduction Tool Kit to the applicant. The Guidelines present in annexes the Contract, Application form and Tariffs of PEFC Logo Fee. The fees in generally depend on membership of PEFC Polska. Next, fees for forest owners and managers are area dependent and fees for forest related industries are turnover dependent. No fee is charged for other users and PEFC Polska members. No non-conformities are found.

### 9.2. Results

The following reference documents are for the Polish PEFC Scheme normative for the application of the issuance of PEFC logo usage licenses procedures: PEFC ST 2001:2008 and PEFC GD 1004:2009. The procedures comply with the PEFC requirements.



## 10. Complaints and Dispute Resolution Procedures

This chapter presents the findings of the assessment of the Complaints and Dispute Resolution Procedures. Two non-conformities are found, which are classified as minor. The Standard and Scheme Requirement Checklist related to the Complaints and Dispute Resolution Procedures can be found in Annex 1 part VI, which presents all the conformities, non-conformities and related references.

### 10.1. Analysis

For the Complaints and Dispute Resolution Procedures, PEFC Polska refers to Chapter 9 in PEFC PL 1002:2013 Certification and Accreditation Procedures. The chapter presents the procedures for dealing with appeals, complaints and disputes, related to the certification process and to the governance and administration of the PEFC scheme. Two non-conformities were found, which are both classified as minor, as they do not directly impact the standard setting process and certification of forests and forest products.

### 10.2. Results

Below, the non-conformities are presented, starting with the requirement (text in a block), followed by references providing the evidence for conformity with the requirement (normal and/or bold text), clarification by the consultant (italic text) and closed with a statement on the conformity and a corrective action request (underlined text).

7. Upon receipt of the complaint, the procedures shall provide for:  
7b. gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint

#### **PEFC PL 1001:2012, 9.3.:**

“In the case of objections put forward by any person or organization which relate to decision and/or the activities of PEFC Polska, following procedure shall be applied:

- c) The office of PEFC Polska considers the complaint seeking solution and prepare a report containing the results of the analysis of the complaint and proposed solutions, and will send it to the Board of Directors of PEFC;
- d) On the basis of the recommendations prepared by the office of PEFC Polska, the Board of Directors of PEFC Polska decides on the complaint solution;
- e) (...)The decision of Board of Directors of PEFC Polska is binding.”

*The procedures insufficiently ensure the impartial evaluation, as the evaluation of complaints relating to decision and/or activities of PEFC Polska, are evaluated by the*



*office of PEFC Polska and decisions are made by the Board of Directors of PEFC Polska, which are furthermore binding.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard

7. Upon receipt of the complaint, the procedures shall provide for:  
7c. formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties

**PEFC PL 1001:2012, 9.3.:**

“In the case of objections put forward by any person or organization which relate to decision and/or the activities of PEFC Polska, following procedure shall be applied:

e) The Board of Directors of PEFC Polska informs the complainant in writing form on the outcome of the complaint solution process. The decision of Board of Directors of PEFC Polska is binding.”

*No reference was found that PEFC Polska shall formally communicate the **complaint handling process** to the complainant. The references only ensure the communication of the **decision**.*

Does not conform – minor

Corrective action request: provide evidence to show conformity or update standard





## 11. Notification of Certification Bodies Procedures

This chapter presents the findings of the assessment of the Notification of Certification Procedures. No non-conformities are found. The Standard and Scheme Requirement Checklist related to the PEFC Notification of Certification Bodies can be found in Annex 1 part VI, which presents all conformities and related references.

### 11.1. Analysis

The Forest Research Institute (IBL) is the PEFC National Governing Body in Poland. The certification bodies have to apply to IBL to obtain the PEFC notification. The procedures governing the notification of certification bodies are the PEFC Polska Guidelines named “Procedure for PEFC Notification of Certification Bodies operating Forest Management System and/or Chain of Custody Certification in Poland”. No non-conformities are found. However, the standard contains some inconsistencies, as the name refers to both Forest Management Certification and Chain of Custody certification, while the main body mostly only refers to Chain of Custody certification (e.g. in the objectives). Next, one observation is identified:

- Appendix II, Article 4 clause 1: The contract termination clause implicitly provides an opportunity to terminate the contract without any reason, which is considered remarkable.

### 11.2. Results

The following reference documents are for the Polish PEFC Scheme normative for the application of the notification of certification bodies procedures: ISO/IEC 17021, PEFC PL 1003, ISO Guide 65, PEFC ST 2002:2013. In the **PEFC PL 1002:2013** Certification and Accreditation Procedures, the Polish PEFC Scheme furthermore refers to the PEFC ST 2003:2012:

#### “3. Normative references

The documents referenced below are indispensable for the application of this document. For both dated and undated references, the latest edition of the referenced document (including any amendments) applies:

PN-EN ISO/IEC 17021:2011 Conformity assessment – Requirements for bodies providing audit and certification of management systems

PN-EN ISO 19011:2012 Guidelines for management systems auditing

PN-EN ISO/IEC 17065:2012, Conformity assessment — Requirements for bodies certifying products, processes and services

PEFC PL 1003:2012 Sustainable forest management - requirements

PEFC ST 2002:2013 Chain of custody of Forest based products - requirements

**PEFC ST 2003:2012** Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard”



And further:

**“4.1 Competence of Certification Bodies**

2) The certification body carrying out chain of custody certification against PEFC ST 2002 shall fulfil requirements defined in PEFC ST 2003 and PN-EN ISO/IEC 17065”

The procedures comply with the PEFC requirements.



## 12. Certification and Accreditation Procedures

This chapter presents the findings of the assessment of the Certification and Accreditation Procedures. No non-conformities were found. The Standard and Scheme Requirement Checklist related to the Certification and Accreditation Procedures can be found in Annex 1 part IV, which presents all the conformities and related references.

### 12.1. Analysis

For the Certification and Accreditation Procedures, PEFC Polska referred to PEFC PL 1002:2013: Certification and accreditation procedures, which largely follows the structure and wording of the PEFC Council Technical Document, Annex 6. No non-conformities were found. One observation is identified:

- Chapter 7 stipulates that Certification Bodies shall be accredited by the Polish Accreditation Centre. This clause narrows the option provided by PEFC International, in the sense that other national accreditation bodies are allowed under the PEFC International requirement, whereas they are excluded in the Polish Scheme. It is however remarkable that the Polish Procedure for PEFC Notification of Certification Bodies, Chapter 3 reads: “The certification body (...) shall (...) have a valid accreditation certificate issued by the Polish Centre for Accreditation (...) or by a national accreditation body from another country which is also a member of the IAF”.

### 12.2. Results

The following reference documents are for the Polish PEFC Scheme indispensable for the application of the certification and accreditation procedures: PN-EN ISO/IEC 17021:2011, PN-EN ISO/IEC 19011:2012, ISO/IEC Guide 65:1996 (PN-EN 45011:2000), PEFC PL 1003:2012, PEFC ST 2002:2013 and PEFC ST 2003:2012 (the latest edition of the referenced document applies).

#### **PEFC PL 1002:2013:**

##### “3. Normative references

The documents referenced below are indispensable for the application of this document. For both dated and undated references, the latest edition of the referenced document (including any amendments) applies:

PN-EN ISO/IEC 17021:2011 Conformity assessment – Requirements for bodies providing audit and certification of management systems

PN-EN ISO 19011:2012 Guidelines for management systems auditing

PN-EN ISO/IEC 17065:2012, Conformity assessment — Requirements for bodies certifying products, processes and services

PEFC PL 1003:2012 Sustainable forest management - requirements

PEFC ST 2002:2013 Chain of custody of Forest based products - requirements



PEFC ST 2003:2012 Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

4.1 Competence of Certification Bodies

2) The certification body carrying out chain of custody certification against PEFC ST 2002 shall fulfil requirements defined in PEFC ST 2003 and PN-EN ISO/IEC 17065”

The procedures comply with the PEFC requirements.



## Annex 1 PEFC Standard and Scheme Requirement Checklist

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### Part I: PEFC Standard Requirements Checklist for standard setting

#### 1 Scope

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

#### 2 Checklist

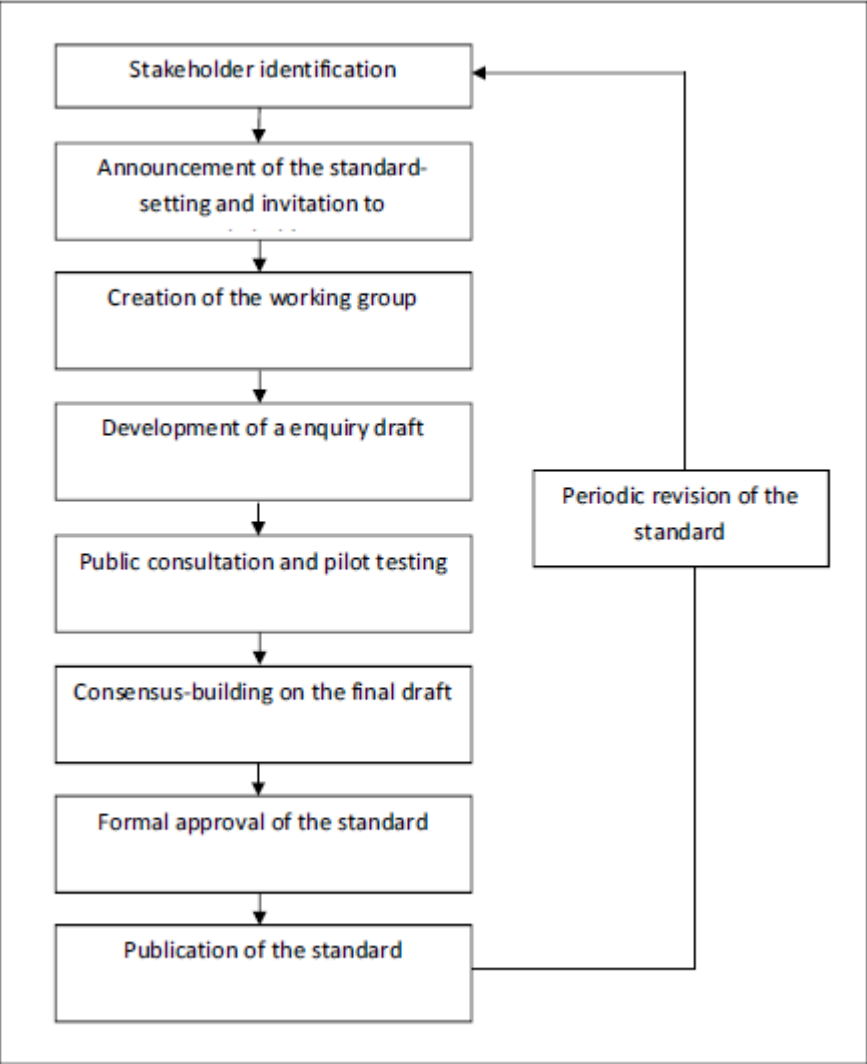
Question	Assess. basis	YES /NO	Reference to application documents
<b>Standardising Body</b>			
4.1 The standardising body shall have written procedures for standard-setting activities describing:			
a) its status and structure, including a body responsible	Procedures	YES	<b>Bylaws of PEFC Polska, §1:</b> “1. The PEFC Polska Council (...) shall be a decision-making body with regard to definition and review of criteria and indicators of sustainable forest management and supply chain certification.”



Question	Assess. basis	YES /NO	Reference to application documents
for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),			<p><b>Bylaws of PEFC Polska, §2:</b>                      “2. The task of the Forest Research Institute as a member of the PEFC Council shall be to manage the forest certification system under the PEFC scheme in Poland, while the Council's task shall be to:                      2.1. review on a regular basis the Polish forest certification system operating in accordance with the legal system of the Republic of Poland and the rules laid down by the PEFC Council based in Geneva.”</p> <p><b>Bylaws of PEFC Polska, §6:</b>                      “1. The Council's governing bodies shall be:                      1.1.General Meeting of members, divided into three chambers: forest management, woodworking and non-wood material processing industry and socio-scientific chambers.                      1.2. Board of Directors.”</p> <p><b>Bylaws of PEFC Polska, §7:</b>                      “1. The General Meeting of Members is the highest authority of the Council.                      2. The General Meeting comprises three chambers and each member may join one chamber only.”</p> <p><b>Bylaws of PEFC Polska, §9:</b>                      “1. The Council shall set up standing or ad hoc Working Groups, depending on the need to address various tasks and issues.”</p> <p><b>PEFC PL 1001:2012:</b>                      “4.1.5. Revisions of the Polish standard of forest management within the PEFC scheme are made by the PEFC Polska through a working group appointed by PEFC Polska.                      4.7.1. The decision of the working group to recommend the final draft for formal approval shall be made on the basis of a consensus.                      4.7.2. The PEFC Polska Council shall formally approve the standard reached by consensus through a vote taken by the working group.”</p>
b) the record-keeping procedures,	Procedures	YES	<p><b>PEFC PL 1001:2012:</b>                      “4.1.6. PEFC Polska shall maintain documentation related to the standard setting process. All documents and data shall be kept for at least five years.”</p>

Question	Assess. basis	YES /NO	Reference to application documents
c) the procedures for balanced representation of stakeholders,	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.1. The PEFC Polska shall identify stakeholders (...) relevant to the objectives and scope of the standard-setting work, who will be invited to nominate their representatives to the working group developing the standard.</p> <p>4.2.2. The PEFC Polska shall invite working group members from the broadest circle of stakeholders, such as forest owners and managers, those conducting commercial activities in forests, organisations producing and selling forest products, entrepreneurs, consumer, environmental and youth organisations, local officials and scientific institutions.</p> <p>4.2.3. For the working group to function, it is essential that the following key stakeholders shall be involved in its work:</p> <ul style="list-style-type: none"> <li>- forest owners and managers,</li> <li>- organisations producing and marketing wood products,</li> <li>- those who receive income from the forest,</li> <li>- social organisations and those who use the forest for its non-productive functions and recreation.</li> </ul> <p>4.2.6. The PEFC Polska shall make every effort to ensure the balanced and broadest possible representation of all stakeholder groups in work on setting and revising standards, and to ensure that they would not experience discrimination because of ideological, social or economic reasons.”</p>
d) the standard-setting process,	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p>



Question	Assess. basis	YES /NO	Reference to application documents
			<p>Figure 1: The standard-setting process</p>  <pre> graph TD     A[Stakeholder identification] --&gt; B[Announcement of the standard-setting and invitation to...]     B --&gt; C[Creation of the working group]     C --&gt; D[Development of a enquiry draft]     D --&gt; E[Public consultation and pilot testing]     E --&gt; F[Consensus-building on the final draft]     F --&gt; G[Formal approval of the standard]     G --&gt; H[Publication of the standard]     H --&gt; I[Periodic revision of the standard]     I --&gt; A     </pre>



Question	Assess. basis	YES /NO	Reference to application documents
			<i>All these steps are further elaborated in chapters 4.2 to 4.8 of PEFC PL 1001:2012.</i>
e) the mechanism for reaching consensus, and	Procedures	YES	<p><b>PEFC PL 1001:2012 chapter 4.5: Decision making process:</b></p> <p>“4.5.1. (...) In order to reach a consensus, the working group can utilise one of the following methods to determine whether there is opposition:</p> <p>a) a face-to face meeting where there is a verbal yes/no vote; show of hands for a yes/no vote; a statement on consensus from the Chairperson where there are no dissenting voices (or no dissenting voices through a show of hands (vote); a formal balloting process, etc.),</p> <p>b) a telephone conference meeting, where there is a verbal yes/no vote,</p> <p>c) an e-mail meeting, where a request for agreement or objection is provided to members (with the members providing a written response, a proxy for a vote), or</p> <p>d) combinations thereof.</p> <p>4.5.3. In the case of a negative vote representing sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <p>a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,</p> <p>b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,</p> <p>c) dispute resolution process (e.g. arbitration).”</p>
f) revision of standards/normative documents.	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.1.2. Developing a new standard or revising an existing one shall include the objective of the revision and take into account expert reports and research results.</p> <p>4.1.5. Revisions of the Polish standard of forest management within the PEFC scheme are made by the PEFC Polska through a working group appointed by PEFC Polska. A periodic revision of the standard is conducted every five years. The process of revising the standard shall begin at least one year before five-year period ends.”</p>
	Procedures	YES	<b>PEFC PL 1001:2012:</b>



Question	Assess. basis	YES /NO	Reference to application documents
<p>4.2 The standardising body shall make its standard-setting procedures publicly available and shall regularly review its standard-setting procedures including consideration of comments from stakeholders.</p>			<p>“4.1.3. Revisions of the standard-setting procedures within the PEFC scheme are made by the PEFC Polska through a working group appointed by PEFC Polska. A periodic revision of the standard-setting procedures is conducted every five years. The process of revising the standard setting procedures shall begin at least one and a half year before five-year period ends.</p> <p>4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. The invitation includes:</p> <p>e) an invitation to comment on the scope and the standard-setting process, and</p> <p>f) reference to publicly available standard-setting procedures (at PEFC Polska website).</p> <p>4.2.7. The PEFC Polska reviews the standard-setting process based on comments received from public consultations.</p> <p>4.7.3. The formally approved/revised standards shall be published and made publicly available.”</p> <p><i>Although not explicitly stated, it is assumed that 4.7.3 does also apply for the standard-setting procedures, based on 4.1.3 and the following chapters in the procedures and references such as 4.2.5.f.</i></p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme:</b></p> <p><b>“4 Revision Process</b></p> <p>On February 2011 PEFC Polska has initiated the first revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management for forest certification. According to the decision of the board, the works on the revision of the system were to be conducted in two working groups. At the same time revision of standard setting procedure was launched.</p> <p>On the 8th of February 2012, PEFC Polska announced and invited for participation in process of revision on its website (...) and by announcements published in forest media (...) and on State Forests’ website.</p> <p>The announcement included:</p> <ul style="list-style-type: none"> <li>- information about the objectives, scope and the steps of the standard-setting process,</li> <li>- an invitation to comment on the scope and the standard-setting process,</li> <li>- the invitation to stakeholders to nominate their representative(s) to the working group.”</li> </ul>

Question	Assess. basis	YES /NO	Reference to application documents
			<i>Working Group 2 was in charge of the revision of the Standard Setting Procedures and minutes show that comments (submitted by stakeholders participating in this working group) were discussed and in cases also adopted.</i>
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.	Procedures	YES	<b>PEFC PL 1001:2012:</b> "4.1.6. PEFC Polska shall maintain documentation related to the standard setting process. All documents and data shall be kept for at least five years. All records shall be available to interested parties upon request."
	Process	YES	<i>Examples of kept records, such as translated announcement of the revision and invitation letters, minutes of WG1 and WG2, voting results and other documents were found by the assessor.</i>
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for	Procedures	YES	<b>PEFC PL 1001:2012:</b> "4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. 4.2.8. Based on the nominations received, a working group shall be established, responsible for activities related to standard-setting."
	Process	YES	<b>First Revision of the Polish PEFC scheme:</b> "3.2. Working Group 1



Question	Assess. basis	YES /NO	Reference to application documents
standard-setting activities.			<p>The PEFC Polska established the temporary working group responsible for revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management for forest certification) based on received nominations.</p> <p>3.3. Working Group 2</p> <p>Working Group 2 consisted of stakeholders interested in working on technical documents PEFC Polska, which were outside the scope of interest of the Working Group 1.</p> <p>4.1. Start of revision process</p> <p>On February 2011 PEFC Polska has initiated the first revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management for forest certification. According to the decision of the board, the works on the revision of the system were to be conducted in two working groups.”</p> <p><i>Although no reference was found (e.g. minutes of Board of Directors meeting) providing evidence that PEFC Polska <b>formally established</b> the working groups, it is clear from other records (minutes Working Groups, voting results) that the Working Groups were operative.</i></p>
4.4 The working group/committee shall:			
a) be accessible to materially and directly affected stakeholders,	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.8. (...) The group/committee shall:</p> <p>a) be accessible to materially and directly affected stakeholders”</p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme:</b></p> <p>“4.2. The appointment of working group</p> <p>All nominated representatives of stakeholders were included in the working groups.”</p> <p><i>Although no evidence (e.g. minutes of Board of Directors meeting) was found that all nominated representatives of stakeholders have been <b>formally</b> included in the working groups, other records (list of Working Group members, minutes) provide sufficient evidence that the working group included materially and directly affected stakeholders.</i></p>
	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p>

Question	Assess. basis	YES /NO	Reference to application documents																											
<p>b) have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process, and</p>			<p>“4.2.3. For the working group to function, it is essential that the following key stakeholders shall be involved in its work:</p> <ul style="list-style-type: none"> <li>- forest owners and managers,</li> <li>- organisations producing and marketing wood products,</li> <li>- those who receive income from the forest,</li> <li>- social organisations and those who use the forest for its non-productive functions and recreation</li> <li>- disadvantaged stakeholders.</li> </ul> <p>4.2.8. Based on the nominations received, a working group shall be established, responsible for activities related to standard-setting. The group/committee shall:</p> <p>b) have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard, where single concerned interests shall not dominate nor be dominated in the process”</p>																											
	Process	YES	<p><b>First Revision of the Polish PEFC scheme:</b></p> <p><b>“4.2. The appointment of working group</b></p> <p>All nominated representatives of stakeholders were included in the working groups.”</p> <p><i>An overview of the number of persons per category per working group is presented in the table below (made by the assessor, derived from the Revision Report).</i></p> <table border="1" data-bbox="775 959 1447 1329"> <thead> <tr> <th>Stakeholder category</th> <th>WG1</th> <th>WG2</th> </tr> </thead> <tbody> <tr> <td>Forest owner / manager (state)</td> <td>21</td> <td>13</td> </tr> <tr> <td>Forest owner / manager (private)</td> <td>0</td> <td>0</td> </tr> <tr> <td>Public administration</td> <td>1</td> <td>0</td> </tr> <tr> <td>Forest / wood related industry</td> <td>1</td> <td>0</td> </tr> <tr> <td>NGO's</td> <td>7</td> <td>2</td> </tr> <tr> <td>Forest Science</td> <td>1</td> <td>1</td> </tr> <tr> <td>Private person</td> <td>1</td> <td>0</td> </tr> <tr> <td><b>Total</b></td> <td><b>32</b></td> <td><b>16</b></td> </tr> </tbody> </table> <p><b>Additional explanation provided by PEFC Polska:</b></p>	Stakeholder category	WG1	WG2	Forest owner / manager (state)	21	13	Forest owner / manager (private)	0	0	Public administration	1	0	Forest / wood related industry	1	0	NGO's	7	2	Forest Science	1	1	Private person	1	0	<b>Total</b>	<b>32</b>	<b>16</b>
Stakeholder category	WG1	WG2																												
Forest owner / manager (state)	21	13																												
Forest owner / manager (private)	0	0																												
Public administration	1	0																												
Forest / wood related industry	1	0																												
NGO's	7	2																												
Forest Science	1	1																												
Private person	1	0																												
<b>Total</b>	<b>32</b>	<b>16</b>																												



Question	Assess. basis	YES /NO	Reference to application documents
			<p>“The Board PEFC made all efforts to involve representatives of the private forests to working groups, sending letters of invitation to ten private forest owners associations (contact details are only addresses, no e-mails, no phone numbers). The letters were returned with the notation "addressee unknown".</p> <p>Two active associations, the Polish Union of Associations of Forestry and the Association of Zawoja were not interested in participating in the working groups. The Board PEFC have not the resources of persuasion to get them to actively participate in the revision process. Initiated by the Board PEFC Poland President of the Polish Union of Associations of Forestry Władysław Pędziwiatr has issued the opinion (included with English translation).</p> <p>It should also be noted that although we found private forest owners as an interested party (stakeholder), but currently there is no prospect of certification of private forest holdings in Poland. Certainly, such prospects will not appear at the time of the new standard. Private forest holdings (rather small plots, in fact an average of 1,5 ha) are very fragmented and private forest owners are no interested in forest certification.”</p> <p><i>All nominated representatives were included in the Working Groups (no refusals) and all categories were represented, except the private forest owners. PEFC Polska explained that in total eleven private forest owners' associations were identified and invited to participate in the revision process. None of them participated or responded to the invitation. Results of the stakeholder survey do not indicate unbalanced representation.</i></p>
<p>c) include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected</p>	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.8. (...) The group/committee shall:</p> <p>c) include stakeholders with knowledge and experience relevant to the subject matter of the standard, those who are materially affected by the standard, and those who can influence implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.”</p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme, chapter 4.1:</b></p> <p>The PEFC Polska identified disadvantaged stakeholder: private forest owners. In Poland private forests are very fragmented and poorly managed. Private forest owners are very poor represented in the forest sector (the most of private forest associations established with support of Environment Ministry are not active). The PEFC Polska did it's best to incorporate private forest owners to revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management – for forest certification.</p>

Question	Assess. basis	YES /NO	Reference to application documents
stakeholders shall represent a meaningful segment of the participants.			<p>Despite of special means to involve private forest owners in the process, the PEFC Polska's efforts failed. Private forest owners' associations did not answer to announcements and invitations sent by post, electronic and phone calls. For this reason the PEFC Polska paid special attention to represent the private forest owner's interests in the process.</p> <p>The PEFC Polska identified the key stakeholder: the State Forests National Forest Holding. The State Forests National Forest Holding manages 7.5 mln hectares of forests – 77.4% of total forest resources in Poland.”</p> <p><i>It is observed that the working groups contained stakeholders with relevant expertise and materially affected stakeholders (state forest owners), representing a meaningful segment of the participants.</i></p>
4.5 The standardising body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders.	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.8.1. PEFC Polska shall establish procedures for dealing with any substantive and/or procedural complaints related to standardising activities and make this information accessible to stakeholders. Upon receipt of a complaint, PEFC Polska shall:</p> <ul style="list-style-type: none"> <li>a) acknowledge receipt of the complaint to the complainant,</li> <li>b) appoint impartial appeal committee with the expertise to evaluate the complaint or appeal,</li> <li>c) notify the complainant of the decision taken.</li> </ul> <p>The office of PEFC Polska is the contact point for enquiries and complaints related to its standard-setting activities.</p> <p>4.8.2. To ensure proper functioning of the appellant procedure, the Board of Directors of the PEFC Polska Council shall establish an appeal committee to consider appeals, complaints and disputes.</p> <p>The appeal committee of the PEFC Polska Council shall consist of the Chairman of PEFC Polska or any person authorized by him and of 2-3 experts appointed by him, competent in the subject matter of the appeal, complaint or dispute under consideration.</p> <p>On the written motion containing justification of request, the parties may once request that one of the appointed experts be changed.</p> <p>The consideration procedure of an appeal, a complaint or a dispute by the arbitration commission shall take not more than 1 months. Complainant shall be immediately informed of the decision made by letter or by email.</p>

Question	Assess. basis	YES /NO	Reference to application documents
			If the arbitration commission of the PEFC Polska conducts arbitration proceedings, it shall present a report on its activities, together with any adopted decisions and proposed corrective measures, at the General Meeting of Members of PEFC Polska. Documentation concerning conducted proceedings, undertaken corrective measures and their effectiveness shall be maintained and stored by the PEFC Polska.”
	Process	YES	<i>The Standard Setting Procedures could be found on the PEFC Polska website.</i>
4.5 Upon receipt of the complaint, the standard-setting body shall:			
a) acknowledge receipt of the complaint to the complainant,	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.8.1. (...) Upon receipt of a complaint, PEFC Polska shall: a) acknowledge receipt of the complaint to the complainant,(...) “
	Process	YES	<i>According to PEFC Polska there were no complaints relating to the standardizing activities, this was confirmed by the survey respondents.</i>
b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint, and	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.8.1. (...) Upon receipt of a complaint, PEFC Polska shall: b) appoint impartial appeal committee with the expertise to evaluate the complaint or appeal, The appeal committee shall gather and verify all necessary information to assess the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint.”
	Process	YES	<i>According to PEFC Polska there were no complaints relating to the standardizing activities, this was confirmed by the survey respondents.</i>
c) formally communicate the decision on the	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.8.1. (...) Upon receipt of a complaint, PEFC Polska shall: b) provide the complaint handling procedure to the complainant;





Question	Assess. basis	YES /NO	Reference to application documents
complaint and of the complaint handling process to the complainant.			d) notify the complainant of the decision taken. 4.8.2. (...) Complainant shall be immediately informed of the decision made by letter or by email.”
	Process	YES	<i>According to PEFC Polska there were no complaints relating to the standardizing activities, this was confirmed by the respondents of the stakeholder survey.</i>
4.6 The standardising body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	Procedures	YES	<p><b>PEFC PL 1001:2012</b></p> <p>“4.8.1. The office of PEFC Polska is the contact point for enquiries and complaints related to its standard-setting activities.”</p> <p><i>The address of PEFC Polska can be found on the cover of the standard and on the website.</i></p>
<b>Standard-setting process</b>			
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.1. The PEFC Polska shall identify stakeholders (...) relevant to the objectives and scope of the standard-setting work”</p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme, chapter 4.1:</b></p> <p>“The PEFC Polska identified stakeholders relevant to the objectives and scope of the revision process of the Polish criteria and indicators of sustainable forest management for forest certification as follows:</p> <ol style="list-style-type: none"> <li>1) forest owners/managers (private and state service),</li> <li>2) forest/wood related industry/business,</li> <li>3) non-governmental organisations (forest and ecology),</li> </ol>



Question	Assess. basis	YES /NO	Reference to application documents
			<p>4) authorities (public administration and local government),                      5) forest science. “  <i>A list of identified stakeholders was found that were of the following categories: Research and Education (3), Environmental NGO’s (10), Contractors / Entrepreneurs (6), Forest Owner’s Associations (11), Governmental Organizations (8), and others (13). The State Forest was not included in this address list, as all information was distributed via the General Directorate of State Forest. The stakeholders are considered relevant to the objectives and scope of the standard-setting work.</i></p>
<p>5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.</p>	Procedures	YES	<p><b>PEFC PL 1001:2012:</b>                      “4.2.1. The PEFC Polska shall identify stakeholders, with emphasis on disadvantaged stakeholders, relevant to the objectives and scope of the standard-setting work, who will be invited to nominate their representatives to the working group developing the standard.                      4.2.3. For the working group to function, it is essential that the following key stakeholders shall be involved in its work:                      - forest owners and managers,                      - organisations producing and marketing wood products,                      - those who receive income from the forest,                      - social organisations and those who use the forest for its non-productive functions and recreation                      - disadvantaged stakeholders.                      4.2.6. The PEFC Polska shall make every effort to ensure the (...) representation of all stakeholder groups in work on setting and revising standards, and to ensure that they would not experience discrimination because of ideological, social or economic reasons.”</p>
	Process	NO	<p><b>First Revision of the Polish PEFC scheme, chapter 4.1:</b>                      “The PEFC Polska identified disadvantaged stakeholder: private forest owners. In Poland private forests are very fragmented and poorly managed. Private forest owners are very poor represented in the forest sector (the most of private forest associations established with support of Environment Ministry are not active). The PEFC Polska did it’s best to incorporate private forest owners to revision of the PEFC National Standard (...). Despite of special means to involve private forest owners in the process, the PEFC Polska’s efforts failed. Private forest owners’ associations did not answer to announcements and invitations sent by post, electronic</p>



Question	Assess. basis	YES /NO	Reference to application documents
			<p>and phone calls. For this reason the PEFC Polska paid special attention to represent the private forest owner's interests in the process.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The ownership structure of forests in Poland is very specific. Public forests dominate (82%), private forests are slightly above 16%. In addition, private forests are highly fragmented - the average private forest is about 1 hectare, which means more than a million owners, most of whom are not interested at all in forest management. Private forest owners are very reluctant to associate, which is, in a sense, a remnant of the past political system. Practically in the whole country there are only a dozen or so associations and only a few of them operate actively. PEFC Poland undertook various attempts to involve private forest owners in the work on the revision of the scheme contacting them by phone and e-mail (if available) as well as surface mail - practically with no results. In the case of letters a part of them has not been open by the recipients and returned to the office of PEFC Poland.”</p> <p><i>PEFC Polska explained that they sought the participation of private forest owners' associations (including web-searches for addresses, phone calls and invitation letters), and listed several associations that were invited. However, insufficient references in records are found providing the evidence. Without this evidence it is difficult to verify whether these activities were sufficient to seek the private forest owners' participation.</i></p>
<p>5.3 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford</p>	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.4. The PEFC Polska shall publically announce the start of the standard-setting/revision process and include an invitation for participation in a timely manner (at least three weeks before the start) on its website to afford stakeholders an opportunity for meaningful involvement in the process.</p> <p>4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group.”</p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme, chapter 4.1:</b></p> <p>“On February 2011 PEFC Polska has initiated the first revision of the PEFC National Standard: Polish criteria and indicators of sustainable forest management for forest certification. (...) At the same time revision of standard setting procedure was launched.</p> <p>On the 8th of February 2012, PEFC Polska announced and invited for participation in process of revision on its website (...) and by announcements published in forest media (Las Polski) and on State Forests' website.”</p> <p><b>Invitation letter, dd 8<sup>th</sup> of February 2012:</b></p>



Question	Assess. basis	YES /NO	Reference to application documents
stakeholders an opportunity for meaningful contributions.			<p>“One of the basic assumptions of the recognition of criteria and certification in PEFC scheme is to ensure the participation in the process of all legal entities and individuals interested in forestry, nature conservation and sustainable development. Therefore, the invitation is addressed to you to actively participate in the planned works. Over the next month we are waiting for appointments of people who will be your representatives in working groups.”</p> <p><i>The letter contains was sent two months before the first Working Group Meeting (dd 12<sup>th</sup> of April 2012), which is considered to be in a timely manner.</i></p>
5.3 The announcement and invitation shall include:			
a) information about the objectives, scope and the steps of the standard-setting process and its timetable,	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.4. The PEFC Polska shall publically announce the start of the standard-setting/revision process and include an invitation for participation (...).</p> <p>4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. The invitation includes:</p> <p>b) information about the objectives, scope and the steps of the standard-setting process and its timetable”</p>
	Process	NO	<p><b>Invitation letter, dd 8<sup>th</sup> of February 2012:</b></p> <p>“The General Assembly of PEFC Polska on February 9, 2011 decided to set up working groups: for revision of forest management standard and for the establishment of standards. One of the basic assumptions of the recognition of criteria and certification in PEFC scheme is to ensure the participation in the process of all legal entities and individuals interested in forestry, nature conservation and sustainable development. Therefore, the invitation is addressed to you to actively participate in the planned works. Over the next month we are waiting for appointments of people who will be your representatives in working groups.”</p> <p><i>In the invitation letter no information was found about the scope and steps of the standard-setting process and its timetable.</i></p>
b) information about opportunities for stakeholders to	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. The invitation includes:</p> <p>c) information about opportunities for stakeholders to participate in the process”</p>



Question	Assess. basis	YES /NO	Reference to application documents
participate in the process,	Process	YES	<p><b>Invitation letter, dd 8<sup>th</sup> of February 2012:</b></p> <p>“General Assembly of PEFC Polska on February 9, 2011 decided to set up working groups: for revision of forest management standard and for the establishment of standards. One of the basic assumptions of the recognition of criteria and certification in PEFC scheme is to ensure the participation in the process of all legal entities and individuals interested in forestry, nature conservation and sustainable development. Therefore, the invitation is addressed to you to actively participate in the planned works.”</p>
(c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“2. Normative references</p> <p>The documents referenced below are indispensable for the application of this document. (...)</p> <p>PEFC ST 1001:2010. Standard Setting – Requirements</p> <p>4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. The invitation includes:</p> <p style="padding-left: 40px;">d) an invitation to stakeholders to nominate their representative(s) to the working group,”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The term stakeholder has a broad meaning and includes all groups interested or potentially interested (or even being influenced by forest certification later on) in forest certification.”</p> <p><i>Observation: the procedures in PEFC PL 1001:2012 do not specify that the invitation to disadvantaged and key stakeholders shall be made in a manner to ensure that the information reaches the intended recipients and in a format that is understandable. However, this is covered by clause 2 of PEFC PL 1001:2012 which refers to the PEFC ST 1001:2010 as being indispensable for the application of the standard.</i></p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme, chapter 4.1:</b></p> <p>“On the 8th of February 2012, PEFC Polska announced and invited for participation in process of revision on its website (...) and by announcements published in forest media (Las Polski) and on State Forests’ website. The announcement included:</p>



Question	Assess. basis	YES /NO	Reference to application documents
			<p>- information about opportunities for stakeholders to participate in the process (a special attention was paid to disadvantaged and key stakeholders),</p> <p>- the invitation to stakeholders to nominate their representative(s) to the working group.”</p> <p><b>Invitation letter, dd 8<sup>th</sup> of February 2012:</b></p> <p>“Last year PEFC Polska opened the process of revision of national PEFC scheme. Therefore, we invite you to submit your representatives to work in the following working groups:</p> <ul style="list-style-type: none"> <li>• Group on standard setting;</li> <li>• Group on sustainable forest management and certification group</li> </ul> <p>[...] General Assembly of PEFC Polska on February 9, 2011 decided to set up working groups: for revision of forest management standard and for the establishment of standards. One of the basic assumptions of the recognition of criteria and certification in PEFC scheme is to ensure the participation in the process of all legal entities and individuals interested in forestry, nature conservation and sustainable development. Therefore, the invitation is addressed to you to actively participate in the planned works. ”</p> <p><i>It is not clear how special attention has been paid to private forest owners’ associations and how it was ensured that the information reached them. This issue was however already raised under requirement 5.2.</i></p>
d) an invitation to comment on the scope and the standard-setting process, and	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. The invitation includes:</p> <p>e) an invitation to comment on the scope and the standard-setting process”</p>
	Process	NO	<p><b>First Revision of the Polish PEFC scheme, chapter 4.1:</b></p> <p>“On the 8th of February 2012, PEFC Polska announced and invited for participation in process of revision on its website (...) and by announcements published in forest media (Las Polski) and on State Forests’ website. The announcement included:</p> <p>- an invitation to comment on the scope and the standard-setting process”</p> <p><b>Invitation letter, dd 8<sup>th</sup> of February 2012:</b></p> <p>“[...] Therefore, the invitation is addressed to you to actively participate in the planned works.”</p>

Question	Assess. basis	YES /NO	Reference to application documents
			<i>No reference is found that the letter included an invitation to comment on the scope and the standard-setting process.</i>
e) reference to publicly available standard-setting procedures.	Procedures	YES	<p><b>PEFC PL 1001:2012:</b>                      “4.2.5. PEFC Polska shall send an invitation to stakeholders to participate in the working group. The invitation includes:                      f) reference to publicly available standard-setting procedures (at PEFC Polska website).”</p>
	Process	NO	<i>The invitation did not include a reference to standard-setting procedures and where they could be found.</i>
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	Procedures	YES	<p><b>PEFC PL 1001:2012:</b>                      “4.2.7. The PEFC Polska reviews the standard-setting process based on comments received from public consultations.                      4.2.8. Based on the nominations received, a working group shall be established, responsible for activities related to standard-setting.                      4.2.9. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group and resources available for the standard-setting.”</p>
	Process	NO	<p><b>First Revision of the Polish PEFC scheme, Chapter 4:</b>                      “4.1. Start of the revision process                      On February 2011 PEFC Polska has initiated the first revision of the PEFC National Standard (...) At the same time revision of standard setting procedure was launched.                      4.2. The appointment of working group                      All nominated representatives of stakeholders were included in the working groups. The PEFC Polska appointed the working groups at their first meeting on the 16th of April 2012, basing on nominations received from invited stakeholders. All the participants were informed of the date of the meeting by e-mail. It was decided at the meeting that working group 1 will work on revision of forest management standard while working group 2 on revision of the technical documents.”  <b>Additional explanation provided by PEFC Polska:</b></p>

Question	Assess. basis	YES /NO	Reference to application documents
requirements for balanced representation of the working group/committee and resources available for the standard-setting.			<p>“The decisions of the Board had not formally been confirmed in the form of formal documents, just working groups have started acting. The PEFC Council in a formal vote on the final version of the standard formally confirmed the legality of the whole process of revision and the establishment of working groups. The acceptance of all nominees was (...) done. Every WG member had equal ability to participate in WG. There was not a one voice concern or objections on the legality of the action taken (in the process and in the stakeholders survey).”</p> <p><i>Although no reference was found (e.g. minutes of Board of Directors meeting) providing evidence that PEFC Polska <b>formally established</b> the working groups, it is clear from other records (minutes Working Groups, voting results) that the Working Groups were operative.</i></p> <p><i>However, no reference was found that the acceptance of nominations was considered justifiable in relation to the requirements for balanced representation. It should be noted that at that time the procedures still included a clause which obliged PEFC Polska to accept <b>all</b> nominees.</i></p> <p><i>According to PEFC Polska, no comments were received on the standard-setting procedures. However, no evidence was found in minutes that provide this evidence (e.g. clauses that refer to this outcome).</i></p>
5.5 The work of the working group/committee shall be organised in an open and transparent manner where:			
a) working drafts shall be available to all members of the working group/committee,	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.3.2. The work of the working group/committee shall be organised in an open and transparent manner where:</p> <p>a. working drafts shall be available to all members of the working group/committee”</p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme, chapter 4.3:</b></p> <p>“WG 1: (...) Working drafts and any other documents were available to all working group members. They were provided to contribute to working group activities. (...). The working group had four meetings (16/04/2012, 11/05/2012, 14-15/06/2012, 22-23/10/2012).</p> <p>WG 2: The working group has reviewed the remaining documents included in the PEFC Polska scheme. The group had three joint meetings (16/04/2012, 11/05/2012, 14-15/06/2012), using also electronic communication.”</p>



Question	Assess. basis	YES /NO	Reference to application documents
			<p><i>Invitations (E-mails) were found for the WG meetings, which included working drafts. Respondents of the stakeholder survey confirmed that working drafts were available to working group members.</i></p> <p><i>Observation: the dates of the meetings of WG 1 provided in the Revision report do not exactly correspond with the dates on the minutes themselves. For example: Minutes of the first meeting are dated 12/04/2012 instead of 16/04/2012; Minutes of the second meeting are dated 12/05/2012 instead of 11/05/2012.</i></p>
<p>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</p>	Procedures	YES	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.3.2. The work of the working group/committee shall be organised in an open and transparent manner where:</p> <p>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”</p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme, chapter 4.3:</b></p> <p>“WG 1: In the open and transparent process the working group elaborated the draft the of the PEFC National Standard “Sustainable forest management – requirements”.</p> <p>WG 2: The working group has reviewed the remaining documents included in the PEFC Polska scheme. The group had three joint meetings (...), using also electronic communication.”</p> <p><b>Minutes of the first meeting of WG 1:</b></p> <p>“At the conclusion the working group agreed (...) the member of the group will sent to the PEFC Poland Office comments and suggestions.”</p> <p><b>Minutes of the second meeting of WG 1:</b></p> <p>“The working group discussed the comments made by Ms. Ewa Referowska-Chodak (Polish Forest Society), Mr. Piotr Dubiel (private person), Mr. Krzysztof Flis (Coordination Center for Environmental Projects) and Mr. Maciej Gomułka (Regional State Forests Directorate Kraków), and also reported during the meeting, and prepared the consolidated version of the standard (criteria 1-5). (...)</p> <p>At the end of the meeting the members of the group mandated M. Kalinowski (PEFC Poland office) to gather all the proposals and submit a consolidated text (criteria 6-7).”</p> <p><b>Minutes of the third meeting of WG1:</b></p>



Question	Assess. basis	YES /NO	Reference to application documents
			<p>“The Working Group considered the comments made by Mr. Hubert Kawalec (Forest District Legnica), Ms. Izabela Pigan (Forest Women's Association), Jerzy Bargiel (Regional State Forests Directorate Toruń), Jerzy Osiak (Association of Foresters and Wood Technologists - SITLID), Tomasz Międzyrzecki (Forest District Miękinia) and prof. Andrzej Lewandowski (Institute of Dendrology of the Polish Academy of Sciences).”</p> <p><i>All respondents of the stakeholder survey confirmed that they were provided with meaningful opportunities to contribute to the revision process and to submit comments.</i></p>
<p>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.</p>	<p>Procedures</p>	<p>YES</p>	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.3.2. The work of the working group/committee shall be organised in an open and transparent manner where:</p> <p>c. comments and views submitted by any member of the working group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded.”</p>
<p>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.</p>	<p>Process</p>	<p>NO</p>	<p><b>First Revision of the Polish PEFC scheme, chapter 4.3:</b></p> <p>“WG 1: (...) The working group activities were recorded. The working group had four meetings (16/04/2012, 11/05/2012, 14-15/06/2012, 22-23/10/2012). In the open and transparent process the working group elaborated the draft the of the PEFC National Standard</p> <p>WG 2: (...) The group had three joint meetings (16/04/2012, 11/05/2012, 14-15/06/2012), using also electronic communication.”</p> <p><b>Minutes of the first meeting of WG 1:</b></p> <p>“At the conclusion the working group agreed that the chairman M. Kalinowski will introduce the agreed amendments to the text of the draft, and the member of the group will sent to the PEFC Poland Office comments and suggestions.”</p> <p><b>Minutes of the second meeting of WG 1:</b></p> <p>“The working group discussed the comments made by Ms. Ewa Referowska-Chodak (Polish Forest Society), Mr. Piotr Dubiel (private person), Mr. Krzysztof Flis (Coordination Center for Environmental Projects) and Mr. Maciej Gomułka (Regional State Forests Directorate Kraków), and also reported during the meeting, and prepared the consolidated version of the standard (criteria 1-5). (...)”</p>



Question	Assess. basis	YES /NO	Reference to application documents
			<p>At the end of the meeting the members of the group mandated M. Kalinowski (PEFC Poland office) to gather all the proposals and submit a consolidated text (criteria 6-7).”</p> <p><b>Minutes of the third meeting of WG1:</b></p> <p>“The Working Group considered the comments made by Mr. Hubert Kawalec (Forest District Legnica), Ms. Izabela Pigan (Forest Women's Association), Jerzy Bargiel (Regional State Forests Directorate Toruń), Jerzy Osiak (Association of Foresters and Wood Technologists - SITLID), Tomasz Międzyrzecki (Forest District Miękinia) and prof. Andrzej Lewandowski (Institute of Dendrology of the Polish Academy of Sciences).”</p> <p><b>Minutes of 2nd meeting of WG2 –dd 11 May 2012:</b></p> <p>“During the meeting work was concentrated on two documents:</p> <p>1. Document: Standard Setting Process - Requirements</p> <p>Ad 1 / Krzysztof Jodłowski discussed the various paragraphs in the document, applying to the text comments presented and discussed by the members of the working group. Members of the group asked Krzysztof Jodłowski to prepare unified version of the standard and send out to participants.”</p> <p><i>No evidence in records (e.g. minutes or tables such as developed for the public consultation comments) was found on the <b>subject</b> of the comments and views from group members, their <b>resolution</b> and <b>proposed changes</b>. It should however be noted that all respondents of the stakeholder survey confirmed that comments and views have been considered in an open and transparent way.</i></p>
5.6 The standardising body shall organise a public consultation on the enquiry draft and shall ensure that:			
a) the start and the end of the public consultation is announced in a timely manner in suitable media,	Procedures	YES	<p><b>PEFC PL 1001:2012, chapter 4.6:</b></p> <p>“PEFC Polska shall organise public consultation on the enquiry draft and ensure that:</p> <p>a) the start and the end of the public consultation is announced in a timely manner in suitable media”</p> <p><i>Observation: The wording ‘timely manner in suitable media’ is relatively vague. It should be noted that this wording (used in the PEFC International procedures) needs further specification for the national (Polish) context, either in the procedures or during the process.</i></p>
	Process	YES	<b>First Revision of the Polish PEFC scheme: Chapter 4</b>



Question	Assess. basis	YES /NO	Reference to application documents
			<p>“The PEFC Polska organised public consultation on the draft elaborated by working group. The beginning and the end of consultation was announced in forest periodicals, on the PEFC Polska’s website (...), and by emails. The special attention was paid to disadvantaged stakeholders – private forest owners.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“Public consultations were announced on PEFC Polska and State Forests websites and in ‘Głos Lasu’ (summer edition, published in the beginning of July 2012), forest magazine focused at people interested in forest and forestry”</p> <p><i>Invitations were further sent by E-mail to many stakeholders. The website announcement and invitation letter for public consultation are dated 12<sup>th</sup> of July 2012, which is the same day as the start of the consultation period. Since the date is not later than the start of the consultation period, the start and end date are considered to be announced in a timely manner.</i></p>
<p>b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable,</p>	<p>Procedures</p>	<p>YES</p>	<p><b>PEFC PL 1001:2012, chapter 4.6:</b></p> <p>“PEFC Polska shall organise public consultation on the enquiry draft and ensure that:</p> <p>b) the invitation of key and disadvantaged stakeholders shall be made by means, which ensure that the information reaches its recipient and is understandable”</p>
	<p>Process</p>	<p>YES</p>	<p><b>First Revision of the Polish PEFC scheme, chapter 4:</b></p> <p>“The PEFC Polska organised public consultation on the draft elaborated by working group. The beginning and the end of consultation was announced in forest periodicals, on the PEFC Polska’s website (...), and by emails. The special attention was paid to disadvantaged stakeholders – private forest owners.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“By “special attention” we understand announcements sent in the form of e-mails (...) and/or surface letters.”</p> <p>“Public consultations were announced on PEFC Polska and State Forests websites and in ‘Głos Lasu’ (summer edition, published in the beginning of July 2012), forest magazine focused at people interested in forest and forestry”</p> <p><i>The evidence of the announcements via websites and the forest journal was found. It is assumed that these ways of announcing were sufficient to reach those private forest owners that are key stakeholders in relation to forest certification (with serious forestry business).</i></p>

Question	Assess. basis	YES /NO	Reference to application documents
c) the enquiry draft is publicly available and accessible,	Procedures	YES	<b>PEFC PL 1001:2012, chapter 4.6:</b> “PEFC Polska shall organise public consultation on the enquiry draft and ensure that: c) the enquiry draft is publicly accessible”
	Process	YES	<i>The invitation included a link to the enquiry draft on the website. The enquiry draft could be found on the website.</i>
d) the public consultation is for at least 60 days,	Procedures	YES	<b>PEFC PL 1001:2012, chapter 4.6:</b> “PEFC Polska shall organise public consultation on the enquiry draft and ensure that: d) the public consultation is for at least 60 days”
	Process	YES	<i>According to the Revision Report and the invitation letter, the consultation period was from 12<sup>th</sup> of July 2012 until 14<sup>th</sup> of September, which is 65 days. This is confirmed by all respondents of the stakeholder survey.</i>
e) all comments received are considered by the working group/committee in an objective manner,	Procedures	YES	<b>PEFC PL 1001:2012, chapter 4.6:</b> “PEFC Polska shall organise public consultation on the enquiry draft and ensure that: e) all comments received are considered by the working group in an objective manner”
	Process	YES	<b>Minutes of the fourth meeting of WG 1 – dd 22 and 23 October 2012:</b> “The Working Group considered more than 170 comments and proposals made to the preliminary draft of the national PEFC Standard: Sustainable forest management – requirements, adopting part of them (whole or in part), part of them – rejecting, and part considering unfounded”  <i>The complete list of 170 comments was found. It included per comment the decision of the working group to (partly) reject or adopt the comments. Respondents of the stakeholder survey all confirmed that the comments were considered by the working group in an objective manner.</i>
f) a synopsis of received comments compiled from material issues, including the results	Procedures	YES	<b>PEFC PL 1001:2012, chapter 4.6:</b> “PEFC Polska shall organise public consultation on the enquiry draft and ensure that: f) a synopsis of received comments related to substantial issues (including information on whether they were included or rejected) is publicly available, for example on a website, g) everyone who submitted a comment or conclusion receives information about this.”



Question	Assess. basis	YES /NO	Reference to application documents
of their consideration, is publicly available, for example on a website.	Process	YES	<p><b>Minutes of the fourth meeting of the WG1 – dd 22 and 23 October 2012:</b>                      “summary of the comments and decisions of the Working Group, together with the justification is available at the following link: (...).”</p> <p><b>Publication on the Website of PEFC Polska, dd 28 December 2012 (translated with Google translate):</b>                      "In the attached link you will find a list of more than 170 comments and amendments to the draft addressed to the Office of the PEFC Poland and taken on each proposal in the decisions of the working group and its argument."  <i>The document could be downloaded from the website.</i></p>
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.	Procedures	N.A.	<i>No pilot testing is required for revision of a standard.</i>
	Process	N.A.	<i>No pilot testing is required for revision of a standard and no pilot testing has been done.</i>
5.8 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus.	Procedures	YES	<p><b>PEFC PL 1001:2012:</b>                      “4.7.1. The decision of the working group to recommend the final draft for formal approval shall be made on the basis of a consensus.”</p>
	Process	YES	<p><b>First Revision of the Polish PEFC scheme, chapter 4:</b>                      “Finally, the working group recommended final draft of the PEFC National Standard “Sustainable forest management – requirements” using internet voting.”</p> <p><b>Minutes of the fourth meeting of WG 1:</b>                      “The working group has prepared and adopted the final version of the document National Standard PEFC: Sustainable forest management – requirements (ready to vote in the Council PEFC Poland).”</p>



Question	Assess. basis	YES /NO	Reference to application documents
			<p><i>Voting results for the forest management standard (records of the balloting, dated 31 October 2012) show that there were 24 positive votes, 2 abstentions and no votes against the approval.</i></p> <p><b>Minutes of the third meeting of WG 2:</b></p> <p>“Then there was voting on the documents developed by the working group. Documents: Group Forest Certification - requirements and Certification and Accreditation Procedures were adopted unanimously. In the case of the Standard setting process - requirements, due to its importance, Internet voting was used. The vote was attended by 12 people - 11 votes in favor and one against.”</p>
<p>5.8 In order to reach a consensus the working group/committee can utilise the following alternative processes to establish whether there is opposition:</p>			
<p>a) a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,</p>	<p>Procedures</p>	<p>YES</p>	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.5.1. (...). In order to reach a consensus, the working group can utilise one of the following methods to determine whether there is opposition:</p> <p>a) a face-to face meeting where there is a verbal yes/no vote; show of hands for a yes/no vote; a statement on consensus from the Chairperson where there are no dissenting voices (or no dissenting voices through a show of hands (vote); a formal balloting process, etc.)”</p>
	<p>Process</p>	<p>YES</p>	<p><b>Minutes of the third meeting of WG 2 (14/15 of June, 2012):</b></p> <p>“Then there was voting on the documents developed by the working group. Documents: Group Forest Certification - requirements and Certification and Accreditation Procedures were adopted unanimously.”</p>
<p>b) a telephone conference meeting where there is a verbal yes/no vote,</p>	<p>Procedures</p>	<p>YES</p>	<p><b>PEFC PL 1001:2012:</b></p> <p>“4.5.1. (...) In order to reach a consensus, the working group can utilise one of the following methods to determine whether there is opposition:</p> <p>b) a telephone conference meeting, where there is a verbal yes/no vote”</p>
	<p>Process</p>	<p>N.A.</p>	<p><i>Not applicable, because no telephone conference meeting was done to reach consensus within the Working Groups.</i></p>



Question	Assess. basis	YES /NO	Reference to application documents
c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.5.1. (...) In order to reach a consensus, the working group can utilise one of the following methods to determine whether there is opposition: c) an e-mail meeting, where a request for agreement or objection is provided to members (with the members providing a written response, a proxy for a vote)”
	Process	YES	<b>Minutes of the third meeting of WG2 (14/15 of June, 2012):</b> “In the case of the Standard setting process - requirements, due to its importance, Internet voting was used. The vote was attended by 12 people - 11 votes in favor and one against.” <i>Evidence of voting forms for the Forest Management Standard sent by Email were found.</i>
d) combinations thereof.	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.5.1. (...) In order to reach a consensus, the working group can utilise one of the following methods to determine whether there is opposition: d) combinations thereof.”
	Process	N.A.	<i>Not applicable because only E-mail / internet voting was done.</i>
5.9 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):			
a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.5.3. In the case of a negative vote representing 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”
	Process	YES	<b>Minutes of the third meeting of WG2 (14/15 of June, 2012):</b> “[...] In the case of the Standard setting process - requirements, due to its importance, Internet voting was used. The vote was attended by 12 people - 11 votes in favor and one against.”





Question	Assess. basis	YES /NO	Reference to application documents
			<i>It is not clear whether the vote <b>against</b> acceptance of the Standard Setting procedures represented a sustained opposition. However, based on the results of the stakeholder survey, it is concluded that there was no sustained opposition.</i>
b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.5.3. In the case of a negative vote representing sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s): b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise”
	Process	YES	<b>Minutes of the third meeting of WG2 (14/15 of June, 2012):</b> “[...] In the case of the Standard setting process - requirements, due to its importance, Internet voting was used. The vote was attended by 12 people - 11 votes in favor and one against.” <i>It is not clear whether the vote <b>against</b> acceptance of the Standard Setting procedures represented a sustained opposition. However, based on the results of the stakeholder survey, it is concluded that there was no sustained opposition.</i>
c) dispute resolution process.	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.5.3. In the case of a negative vote representing sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s): c) dispute resolution process (e.g. arbitration).”
	Process	YES	<b>Minutes of the third meeting of WG2 (14/15 of June, 2012):</b> “[...] In the case of the Standard setting process - requirements, due to its importance, Internet voting was used. The vote was attended by 12 people - 11 votes in favor and one against.” <i>It is not clear whether the vote <b>against</b> acceptance of the Standard Setting procedures represented a sustained opposition. However, based on the results of the stakeholder survey, it is concluded that there was no sustained opposition.</i>
	Procedures	YES	<b>PEFC PL 1001:2012:</b>



Question	Assess. basis	YES /NO	Reference to application documents
5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.			“4.1.7. All important information concerning the standard setting process shall be publicly available via suitable media, e.g. website, e-mails or newspapers.”
	Process	YES	<i>News-items related to the announcement revision, invitation letter, announcement of the public consultation, approval of draft scheme, and links to related documentation could be found on the PEFC Polska website.</i>
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	Procedures	YES	<b>PEFC PL 1001:2012:</b> “4.7.2. The PEFC Polska Council shall formally approve the standard reached by consensus through a vote taken by the working group.”
	Process	NO	<b>First Revision of the Polish PEFC scheme, chapter 4.5:</b> “On 19 <sup>th</sup> of December 2012 the PEFC Polska formally approved the final version of PEFC National Standard “Sustainable forest management – requirements”. <b>Additional explanation provided by PEFC Polska:</b> “The formal approval of the standard took place during a teleconference of the Board of Directors of PEFC Poland, organized by the Chairman, Krzysztof Jodłowski, on 19th December 2012. The Chairman presented the results of the work WG 1 and asked for formal approval of the standard. Information on formal approval was published on PEFC website.” <i>Voting results for the forest management standard (records of the balloting, dd 5<sup>th</sup> of December 2012) show that there were 27 positive votes, 3 abstentions and no votes against the approval.</i> <i>Although voting records of the Council were found, no record was found (e.g. minutes of the Council) providing evidence that the revised sustainable forest management standard was <b>formally approved</b> and that this approval was <b>based on</b> evidence of consensus reached by the <b>working group</b>.</i> <i>Observation: It is remarkable that the PEFC Polska Council had a voting, while consensus in the Working Groups was already reached, proven by earlier votings (WG1- 31 October 2012; WG2 – 15 June 2012).</i>
5.12 The formally approved	Procedures	YES	<b>PEFC PL 1001:2012:</b> “2. Normative references



Question	Assess. basis	YES /NO	Reference to application documents
standards/normative documents shall be published in a timely manner and made publicly available.			<p>The documents referenced below are indispensable for the application of this document. (...)</p> <p>PEFC ST 1001:2010. Standard Setting – Requirements</p> <p>4.7.3. The formally approved/revised standards shall be published and made publicly available.”</p> <p><i>Observation: the procedures in PEFC PL 1001:2012 do not specify <b>when</b> the revised standards shall be published and made publicly available. However, this is covered by clause 2 of PEFC PL 1001:2012 which refers to the PEFC ST 1001:2010 as being indispensable for the application of the standard.</i></p>
	Process	YES	<p><i>According to the dates mentioned in the standard, the final versions of the revised Sustainable Forest Management Standard, Standard Setting Procedures and Group Forest management standard were approved by the PEFC Polska Council on 19-12-2012. A news item was published on the PEFC Polska website on 12-02-2013, which is almost two months later. This is considered in a timely manner, since it was still before the application and transition dates.</i></p>
<b>Revisions of standards/normative documents</b>			
6.1 The standards/normative documents shall be reviewed and revised at intervals that do not exceed a five-year period. The procedures for the revision of the standards/normative documents shall follow those set out in chapter 5.	Process	NO	<p><i>Publication dates of the previous standard versions:</i></p> <ul style="list-style-type: none"> <li>• <i>Certification and Accreditation procedures: February 2005 (revised in 2011)</i></li> <li>• <i>Sustainable Forest Management standard: February 2005 (revised in July 2007)</i></li> <li>• <i>Standard-setting procedures: 2002 (revised in 2010)</i></li> <li>• <i>Notification of Certification Bodies procedures: 2009</i></li> <li>• <i>Group certification procedures: February 2005</i></li> </ul> <p><i>The publication dates of the former versions of different scheme elements vary from 2002 to 2011. The revision intervals of almost all procedures exceeded the five-year period. In case of the forest management standard (July 2007 – Dec 2012) it took over 5 years.</i></p>
6.2 The revision shall define the application date and	Process	YES	<p><b>Scheme Description – The Polish PEFC Scheme, chapter 10:</b></p> <p>“Unless specified otherwise in the standards under the Polish scheme, the transition period for implementation of changes to standards under the Polish scheme is one year from the time the standard has been approved</p>



Question	Assess. basis	YES /NO	Reference to application documents
transition date of the revised standards/normative documents.			<p>by PEFC Council. New certificates issued after the [ insert date of endorsement by PEFC Council ] should be issued according to the revised standards.”</p> <p><i>As the standards are not yet endorsed by PEFCC, the application date and transition date are not yet mentioned in the revised standards.</i></p>
6.3 The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training.	Process	NO	<p><b>Scheme Description – The Polish PEFC Scheme, chapter 10:</b></p> <p>“New certificates issued after the [ insert date of endorsement by PEFC Council ] should be issued according to the revised standards.”</p> <p><i>The publication date of the SFM standard is December 2012 (approval by PEFC Polska Council). Application date will be on the date of endorsement by PEFCC. This means that currently two years have passed since the publication date.</i></p>
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised	Process	YES	<p><b>Scheme Description – The Polish PEFC Scheme, chapter 10:</b></p> <p>“Unless specified otherwise in the standards under the Polish scheme, the transition period for implementation of changes to standards under the Polish scheme is one year from the time the standard has been approved by PEFC Council.”</p> <p><i>As the standards are not yet endorsed by PEFCC, the transition dates are not yet mentioned in the revised standards.</i></p>



Question	Assess. basis	YES /NO	Reference to application documents
standards/normative documents requires a longer period.			

## Part II: PEFC Standard Requirements Checklist for Group Forest Management Certification

### 1 Scope

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

### 2 Checklist

Question	YES / NO	Reference to scheme documentation
<b>General</b>		
4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:		
a) the group organisation,	YES	<p><b>PEFC PL 1004:2012:</b>                      “3.5. Group organisation                      A group of participants represented by the group entity for the purposes of implementing the sustainable forest management standard and its certification.                      Note1: The term “group organisation” is equivalent to the term “regional” or other terms used in a relevant forest certification scheme, to the extent it complies with the content of this definition.                      Note 2: The relationship between the terms “group organisation”, “group entity” and “participant” is shown in Figure 1.”</p>
b) the group entity,	YES	<p><b>PEFC PL 1004:2012:</b>                      “3.2. Group entity                      An entity that represents the participants, with overall responsibility for ensuring the conformity of forest management in the certified area to the sustainable forest management standard and other applicable requirements of the forest certification scheme.                      Note 1: The term “group entity” is equivalent to the term “regional/group applicant”, etc.</p>



Question	YES / NO	Reference to scheme documentation
		Note 2: The relationship between the terms “group organisation”, “group entity” and “participant” is shown in Figure 1.”
c) the participant,	YES	<p><b>PEFC PL 1004:2012:</b></p> <p>“3.6. Participant</p> <p>A forest owner/manager or other entity covered by the group forest certificate, who has the legal right to manage the forest in a clearly defined area, and the ability to implement the requirements of the sustainable forest management standard in that area.</p> <p>Note1: The term “ability to implement the requirements of the sustainable forest management standard” requires the entity to have a long-term legal right to manage the forest and would disqualify one-off contractors from becoming participants in group certification.</p> <p>Note 2: The relationship between the terms “group organisation”, “group entity” and “participant” is shown in Figure 1.”</p>
d) the certified area,	YES	<p><b>PEFC PL 1004:2012:</b></p> <p>“3.1. Certified area</p> <p>The forest area covered by a group forest certificate representing the sum of forest areas of the participants.”</p>
e) the group forest certificate, and	YES	<p><b>PEFC PL 1004:2012:</b></p> <p>“3.3. Group forest certificate</p> <p>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.</p> <p>Note: The term “group forest certificate” is equivalent to the term “regional certificate” or other terms chosen by a relevant forest certification scheme complying with the content of this definition.”</p>
f) the document confirming participation in group forest certification.	YES	<p><b>PEFC PL 1004:2012:</b></p> <p>“3.7. Document confirming participation in group forest certification</p>



Question	YES / NO	Reference to scheme documentation
		A document issued to an individual participant that refers to the group forest certificate and that confirms the participant as being covered by the scope of the group forest certification.”
<p>4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner.</p>	YES	<p><b>PEFC PL 1004:2012, 4.2.:</b>                      “The following requirements for the function and responsibility of the group entity shall include:                      j) To allow participants to participate in other group certification or independent certification. For those participants the group entity shall regularly analyze information on the participants’ certified status and nonconformities and consider them if they have been found in its group forest certification.”</p> <p><b>PEFC PL 1004:2012, 4.3.:</b>                      “The participants of a group certification shall fulfil the following requirements:                      e) To commit that in case where the participant take part in another group forest certification or holds an individual forest management certificate, participant shall, on annual basis, submit evidence on its certified status and immediately provide the group entity with information on any nonconformity.”</p>
<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>	YES	<p><b>PEFC PL 1004:2012, 1.:</b>                      “Group forest management certification requires establishing a specific management structure that includes the individual forest owners/managers. This entity represents the individual owners/managers in forest certification in order to ensure the correct implementation of the sustainable forest management standard and provide a sufficient level of confidence in sampling-based certification activities.”</p> <p><b>PEFC PL 1004:2012, 4.2.:</b>                      “The following requirements for the function and responsibility of the group entity shall include:                      h) To operate an annual internal monitoring programme that provides for the assessment of participants’ conformity with certification requirements; and                      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</p>



Question	YES / NO	Reference to scheme documentation
		<p>body's assessments and surveillance; corrective and preventive measures if required; and the assessment of the effectiveness of corrective actions taken.</p> <p><b>PEFC PL 1004:2012, 4.3.:</b></p> <p>The participants of a group certification shall fulfil the following requirements:</p> <p>a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the PEFC Polska Forest Certification Scheme;</p> <p>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;</p> <p>d) To implement relevant corrective and preventive actions established by the group entity.”</p>
<p>4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.</p>	<p>YES</p>	<p><b>PEFC PL 1004:2012, 4.1.:</b></p> <p>“The group entity is responsible to develop and develop an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard. This internal monitoring programme shall include following elements:</p> <p>a) at the time of joining the group organization, individual participants shall undertake initial assessment against the sustainable forest management standard through an assessment by the group entity;</p> <p>b) the group entity shall carry out internal audit on at least 20% of the total number of participants with regard to their conformity with the sustainable forest management standard on an annual basis;</p> <p>c) the group entity shall ensure that the internal audit is carried out by competent personnel that is impartial to the audited participant;</p> <p>d) the group entity shall evaluate the information about conformity of the participants to the sustainable forest management standard that is obtained from publicly available sources and other interested parties.”</p>



Question	YES / NO	Reference to scheme documentation
		<p><b>PEFC PL 1004:2012, 4.2.:</b></p> <p>“The following requirements for the function and responsibility of the group entity shall include:</p> <p>h) To operate an annual internal monitoring programme that provides for the assessment of participants’ conformity with certification requirements; and</p> <p>i) To operate a review of conformity with the sustainable forest management standard that includes reviewing the results of the internal monitoring programme and the certification body’s assessments and surveillance; corrective and preventive measures if required; and the assessment of the effectiveness of corrective actions taken.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“In the description of Polish forestry we have mentioned the ownership structure of forests in Poland, underlining domination of public forests. The State Forest National Forest Holding (SFNFH) administrates over 80 % of forests and SFNFH is the only forest administrating organization having PEFC certificates, group certificates. Since we have in Poland 17 regional directorates of State Forests, there are 17 group certificate. SFNFH has the same structure regardless the region of Poland (each regional directorate is divided into a number of forest districts) with built-in controlling bodies at the regional and central level. Each forest district is regularly audited by regional directorate (group entity). And no forest district is excluded from internal audit. So I would leave the statement in the standard as it is. Additionally, we never mentioned that monitoring should be carried out for the selected participants only.”</p>
<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:		
a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;	YES	<p><b>PEFC PL 1004:2012, 4.2.:</b></p> <p>“The following requirements for the function and responsibility of the group entity shall include:</p> <p>a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;”</p>

Question	YES / NO	Reference to scheme documentation
b) To provide a commitment on behalf of the whole group organisation to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	<b>PEFC PL 1004:2012, 4.2.:</b> “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 PEFC Polska Forest Certification Scheme;”
c) To establish written procedures for the management of the group organisation;	YES	<b>PEFC PL 1004:2012, 4.2.:</b> “c) To establish written procedures for the management of the group organisation;”
d) To keep records of: - the group entity and participants’ conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme, - all participants, including their contact details, identification of their forest property and its/their size(s), - the certified area, - the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;	YES	<b>PEFC PL 1004:2012:</b> “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 PEFC Polska 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;”
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	YES	<b>PEFC PL 1004:2012, 4.2.:</b> “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 nonconformity with the sustainable forest management standard;”



Question	YES / NO	Reference to scheme documentation
scope of certification in the event of non-conformity with the sustainable forest management standard		
f) To provide participants with a document confirming participation in the group forest certification;	YES	<b>PEFC PL 1004:2012, 4.2.:</b> “f) To provide participants with a document confirming participation in the group forest certification;”
g) To provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	<b>PEFC PL 1004:2012, 4.2.:</b> “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 PEFC Polska Forest Certification Scheme;”
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements, and;	YES	<b>PEFC PL 1004:2012, 4.2.:</b> “h) To operate an annual internal monitoring programme that provides for the assessment of participants’ conformity with certification requirements;”
i) To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body’s evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.	YES	<b>PEFC PL 1004:2012, 4.2.:</b> “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 assessments and surveillance; corrective and preventive measures if required; and the assessment of the effectiveness of corrective actions taken.”
<b>Function and responsibilities of participants</b>		
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	YES	<b>PEFC PL 1004:2012, 4.3.:</b> “The participants of a group certification shall fulfil the following requirements:

Question	YES / NO	Reference to scheme documentation
and other applicable requirements of the forest certification scheme;		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 PEFC Polska Forest Certification Scheme;
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	<b>PEFC PL 1004:2012, 4.3.:</b> “b) To comply with the sustainable forest management standard and other applicable requirements of the PEFC Polska Forest 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;	YES	<b>PEFC PL 1004:2012, 4.3.:</b> “c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise;”
d) To implement relevant corrective and preventive actions established by the group entity.	YES	<b>PEFC PL 1004:2012, 4.3.:</b> “d) To implement relevant corrective and preventive actions established by the group entity.”



### Part III: PEFC Standard and System Requirement Checklist for Sustainable Forest Management

#### 1 Scope

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

#### 2 Checklist

Question	YES / NO	Reference to scheme documentation
<b>General requirements for SFM standards</b>		
4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall		
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.	YES	<i>The requirements mostly refer to “the forest management” or “the certified body”. Requirements are furthermore considered applicable at forest management unit level, both in the cases of individual forest owners as in regional forestry areas under forestry associations.</i>
b) be clear, objective-based and auditable.	NO	<p><i>The criteria are clear, objective-based and auditable. The additional requirements (subnotes A, B, C, etc.) are however confusing, as they do not put thresholds or state what is considered in compliance and what not and therefore the function (and use) is unclear. The standard does not notify if these are indicators and/or verifiers, nor does it provide guidance on how these additional requirements shall be read, interpreted and used: as explanation, examples, or prescribed indicators/verifiers. Some examples from <b>PEFC PL 1003:2012</b>:</i></p> <ul style="list-style-type: none"> <li>• “4.1.5 A. Does the certified body make its forest management plan or its equivalent publicly available? Yes/No (the certified body provides proof of this).”</li> <li>• “4.2.2 C. The area of tree stands damaged by insects in each of the past five years (ha).”</li> <li>• “4.2.10 A. Does the certified body use the types of pesticides mentioned above? Yes/No.”</li> <li>• “4.2.4 A. Does the periodic business plan of the certified body (or its equivalent) include the methods and means used to minimise damage to forest ecosystems? Yes/No (the certified entity shall submit appropriate records).”</li> </ul>



Question	YES / NO	Reference to scheme documentation
		<ul style="list-style-type: none"> <li>• “4.4.1 H. List of forest basic material.”</li> <li>• “4.6.11 B. Do persons carrying out tasks in forest operations comply with health and safety at work principles?”</li> </ul> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The purpose of the indicators, elaborated by working group, is to clarify or expand them [Assessor: criteria]. (...) We do not put restrictions against CB in the implementation of additional indicators.”</p> <p><i>This shall however be clear to all readers of the standard, no such reference was found in the standard.</i></p> <p><i>To the opinion of the assessor, the absence of guidance on these additional requirements does not support the standard as it adds more confusion and risks the misinterpretation of how these requirements shall be used.</i></p>
<p>c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.3.5. Activities related to forest management shall be carried out in a time and manner that does not limit the productive capacity of the forest. Damage to retained stands and trees, as well as degradation to the forest soil shall especially be avoided.</p> <p>A. Does the certified body require that firms contracted for forestry activities also abide by these stipulations?</p> <p>4.3.8. Adequate infrastructure such as roads, transport tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative effects on the environment.</p> <p>F. Does the certified body require such conduct in contracts with firms building and maintaining the infrastructure listed above?</p> <p>4.4.10. Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems.</p> <p>A. Does the certified body require that contracted firms carrying out the activities mentioned above comply with such practices?”</p>

Question	YES / NO	Reference to scheme documentation
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.	YES	<p><b>Explanation provided by PEFC Polska:</b></p> <p>“In the chapter 2 “Main normative references” is the statement as follows: “the criteria contained herein are in accordance with the following laws in force in Poland:</p> <ul style="list-style-type: none"> <li>- act of 28 September 1991 on forests (Journal of Laws 1991, no. 101, item 444),</li> <li>- act of 16 April 2004 on the protection of nature (Journal of Laws 2004, no. 92, item 880), (...)</li> </ul> <p>Both acts, placed on the list of acts as first, contain plenty of references to record-keeping that provides evidence of compliance with the requirements of the forest management standards.”</p> <p><i>Although no reference is found that explicitly requires record-keeping, many records are mentioned in PEFC PL 1003:2012 and will be verified during the audits. It should be noted that references to record-keeping in applicable laws does not ensure the record-keeping related to all criteria: those criteria that are beyond applicable national laws are automatically not covered by these laws.</i></p> <p><i>Observation: It would be better if the standard requires record keeping as such to ensure a consistent maintenance and archiving of the relevant records for a longer timeframe.</i></p>
<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 tools that support land-use planning and nature conservation.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.1.1. Forest management planning shall aim to maintain or increase forest resources and enhance their quality in relation to the dominant function of forests.”</p> <p><b>The Act on Forests of September 28th 1991; Chapter 2:</b></p> <p>“Art. 7. 1. Sustainable forest management is engaged in pursuant to a Forest Management Plan or simplified Forest Management Plan, with account in particular being taken of the following objectives:</p> <ol style="list-style-type: none"> <li>1) the preservation of forests and of their favourable influences on climate, air, water, soil and conditions for human life and health, as well as the natural balance;</li> <li>2) the protection of forests, especially those that, with their associated ecosystems, constitute natural fragments of native nature, or else those particularly valuable in terms of:</li> </ol>



Question	YES / NO	Reference to scheme documentation
		<p>a) the preservation of the diversity of nature,                      b) the preservation of forest genetic resources,                      c) valuable features of the landscape,                      d) the needs of science;                      3) the protection of soils and areas particularly vulnerable to pollution or damage, as well as of special social significance;                      4) the protection of surface and underground waters, and drainage-basin retention, in particular in divide areas and areas of the alimentation of bodies of water by groundwater;                      5) the production – on the basis of rational management – of wood, as well as raw materials and by-products of forest utilisation.</p> <p>2. Forest management in forests constituting Nature Reserves or included within National Parks shall take account of the rules laid down in nature conservation regulations.</p> <p>3. Forest management in forests included in the Register of Monuments, as well as those on land that supports archaeological monuments entered in the said Register, shall be pursued in agreement with the Conservator of Monuments in a given province (Wojewódzki Konserwator Zabytków), with account also being taken of the regulations on the protection and care of monuments.</p> <p>Art. 8. Forest management is pursued in accordance with the principles of:</p> <p>1) the universal protection of forests;                      2) the persistent maintenance of forests;                      3) continuity and the sustainable use of all forest functions;                      4) ongoing augmentation of forest resources.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The main reference in this case (...) is the Forest Act and Nature Protection Act containing obligations, how to use a services and tools that support land-use planning and nature conservation.”</p> <p><i>The Act on Forests does sufficiently ensure that all values of the forest will be enhanced.</i></p>



Question	YES / NO	Reference to scheme documentation
<p>5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.1.2. Forest management shall comprise a cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic effects of forest management operations. This mechanism shall form the basis for a cycle of continuous improvement to minimise or avoid negative effects.”</p>
<p>5.1.3 Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.1.2. (...)Forest resources shall be inventoried and mapped, according to local and national conditions and in correspondence with the topics described in this document.”</p>
<p>5.1.4 Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They shall be based on legislation as well as existing land-use plans, and adequately cover the forest resources.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.1.3. Management plans (or their equivalents) shall be elaborated and periodically updated according to the requirements of national legislation.”  <b>The Act on Forests of September 28th 1991; Chapter 4:</b>                      “Art. 18. 1. Subject to para. 2, a Forest Management Plan shall be drawn up for 10 years                      2. Where the condition of forest so justifies, and most especially where damage or the impacts of natural disasters are present therein, a Forest Management Plan may be drawn up for a period shorter than 10 years.                      4. A Forest Management Plan shall in particular contain:                      1) a description of forests and of land designated for afforestation                      2) an analysis of forest management in the elapsed period;                      2a) a nature conservation programme;                      3) a detailing of tasks, including in particular those concerning:</p>

Question	YES / NO	Reference to scheme documentation
		<p>a) the amount of timber whose harvest is anticipated, as determined in relation to the volumes to be taken in the course of final and pre-final felling,</p> <p>b) afforestation and restocking,</p> <p>c) the tending and protection of forest, including protection against fire,</p> <p>d) game management,</p> <p>e) needs in respect of technological infrastructure.</p> <p>Art. 19. 1. Subject to para. 2, a Forest Management Plan shall be drawn up for forests that constitute property of the Treasury.</p> <p>2. Subject to paras. 3 and 4, a Simplified Forest Management Plan shall be drawn up for forests not constituting Treasury property, as well as for forests forming part of the Treasury Agricultural Property Resource.</p> <p>3. In the case of fragmented forests with areas of up to 10 ha that do not constitute Treasury property, tasks as regards forest management are as set out in a Decision of the Starosta heading a given powiat, on the basis of inventorying of the condition of the said forest.</p> <p>4. Where fragmented forests with areas of up to 10 ha come within the aforesaid Treasury Agricultural Property Resource, tasks in respect of forest management on the basis of the inventorying of the condition of forests are determined by a District Forest Manager.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The national legislation ensures detailed coordination between all types of land-use plans: forest management plans (or their equivalents), Natura 2000 plans, zoning (spatial management) plans etc. In short, the most important acts are Forest Act and Spatial Planning Act (Dz.U. 2003 No. 80, item. 717).”</p> <p>“According to the regulation of the Ministry of the Environment of 12 November 2012 on the specific conditions and procedures for the preparation of the management plan, simplified management plan and inventory of the forest:</p> <p>§ 1. 1. In preparing the management plan, a simplified management plan and inventory of the forest must be taken into account: (...)</p> <p>5) planned in the local legislative acts way of management of forest and its surroundings”</p>



Question	YES / NO	Reference to scheme documentation
<p>5.1.5 Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.1.4. Management plans (or their equivalents) shall include at least: a description of the state of the forest at the time of planning, long- and medium-term objectives, and the average allowable cut during the time of the plan’s duration.</p> <p>4.3.6. Harvesting levels of both wood and non-wood forest products shall ensure sustainability in the long term”</p> <p><b>Act on Forest of September 28th 1991; Chapter 1, article 6:</b></p> <p>“9) the “prescribed cut” [PEFC Polska translation: Allowable cut] means the amount of wood to be harvested set out in a Forest Management Plan or Simplified Forest Management Plan, as this arises out of the need to renew, tend and protect forest, as well as the principles of forest sustainability and continuity of utilisation;”</p> <p><b>Act on Forest of September 28th 1991; Chapter 2, article 13:</b></p> <p>“1. Forest owners shall be obliged to ensure the permanent maintenance of forest cover, as well as continuity of utilisation, and in particular:</p> <p>5) to make rational use of forests in a manner permanently ensuring optimal discharge of all the functions thereof, by means of:</p> <p>a) the harvesting of wood within limits not exceeding a forest’s productive capabilities,</p> <p>b) the harvesting of raw materials and by-products of forest use, in a manner providing for biological renewal, and also ensuring protection of forest-floor vegetation.”</p> <p><b>Act on Forest of September 28th 1991; Chapter 5:</b></p> <p>“Art. 27. 1. Subject to the prohibitions provided for in Arts. 26 and 30, forests constituting Treasury property shall be made available for the gathering and picking of forest-floor produce:</p> <p>1) to meet persons’ own needs;</p> <p>2) for industrial purposes, subject to paras. 2 and 3.</p> <p>2. The gathering and picking of forest-floor produce for industrial purposes shall require the concluding of an agreement with the given Forest District.</p>

Question	YES / NO	Reference to scheme documentation
		<p>3. District Forest Managers shall decline to conclude an agreement of the said kind where gathering from the forest floor poses a threat to the forest environment.</p> <p>Art. 30. 1. In forests, it shall be forbidden:</p> <p>4) to destroy fungi or fungal mycelia;</p> <p>5) to destroy or damage trees, shrubs or other plants;</p> <p>7) to gather and pick the produce of the forest floor, where this activity is marked as prohibited;</p> <p>8) to disturb or collect leaf litter;</p> <p>11) to collect eggs or nestlings of birds or destroy their breeding grounds or nests, or to destroy the holes, dens, lairs and setts of animals, as well as anthills;</p> <p>12) to scare, chase, catch, trap and/or kill wild animals;”</p> <p><b>Act on Forest of September 28th 1991; article 18:</b></p> <p>“1. The management plan shall be made, subject to paragraph. 2, for 10 years, including:</p> <p>1) natural and economic conditions of forest management;</p> <p>2) the purposes and principles of forest management and ways of their implementation, defined for each stand and object, including protective forests.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The detailed rules for the calculation of annual cuts are included in the obligatory Instruction of forest planning. In general, the average annual cut is one-tenth of cuts specified in the plan (effective 10 years).”</p> <p><i>Elaborative clauses in the Forest Act on the calculation of the Annual Allowable Cut were found. Although the word ‘annual’ is missing in 4.1.4, the Polish legislation obliges to calculate the allowable cut over a period of ten years. From this figure, the average annual allowable cut can easily be derived.</i></p> <p><i>Although no reference was found that the sustainable harvesting of non-timber forest products shall be included in the management plan, the assessor concluded that in the Polish context the applicable legislation is sufficient to ensure the sustainable harvesting of non-timber forest products.</i></p>



Question	YES / NO	Reference to scheme documentation
<p>5.1.6 A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is publicly available. The summary may exclude confidential business and personal information and other information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.1.5. The forest management plans or their equivalents) are publicly available.”  <i>Observation: one of the brackets is missing. Furthermore: it is unclear to the assessor whether the forest management plans developed according to the requirements of national legislation (PEFC PL 1003:2012: criteria 4.1.3.) will include confidential information. The PEFC International requirement (PEFC ST 1003:2010 requirement 5.1.6) provides the opportunity to leave this information out. Such a provision is however not included in the Polish PEFC scheme. Implicitly it does not leave room to exclude confidential business or confidential information that is mentioned in the forest management plans, as the whole management plans shall be made publicly available according to criteria 4.1.5. There might be some conflict between Polish legislation on confidential information and the requirements of the Polish PEFC scheme.</i></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>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.1.6. Monitoring of forest resources and evaluation of their management shall be periodically performed and results taken into account during the planning process.”</p>
<p>5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.1.7. Responsibilities for sustainable forest management shall be clearly defined and assigned.”</p>
<p>5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.1.8. Forest management practices shall safeguard the quality and quantity of forest resources in the medium- and long-term by appropriately balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest resources.”  <b>Act on Forest of September 28th 1991; Chapter 2:</b>                      “Art. 7. 1. Sustainable forest management is engaged (...) with account in particular being taken of the following objectives:                      1) the preservation of forests and of their favourable influences on climate, air, soil and conditions for human life and health, as well as the natural balance;</p>

Question	YES / NO	Reference to scheme documentation
		<p>3) the protection of soils and areas particularly vulnerable to pollution or damage (...);</p> <p>Art. 9. 1. With a view to the universal protection of forests being assured, forest owners are obliged to promote and develop balance in forest ecosystems, as well as to raise the level of natural resistance of stands, and in particular:</p> <p>3) to protect forest soils and waters.”</p>
<p>5.1.10 Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.1.8. (...) Appropriate forest management measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.”</p>
<p>5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:</p> <p>a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and</p> <p>b) entails a small proportion of forest type; and</p> <p>c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and</p>	<p>NO</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.1.9. Conversion of forests to other types of land use shall not occur unless in justified circumstances, where the conversion:</p> <p>a) is in compliance with publicly consulted national and regional policies and Polish legislation on land use and forest management;</p> <p>b) does not have significant negative effects on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and</p> <p>c) contributes to long-term conservation, economic, and social benefits.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“the law on access to information on the environment and its protection, public participation in environmental protection and environmental impact assessment (Dz. U. 2013. Poz. 1235), and Environmental Protection Act are applied. Defined in the first act the term "operation" means, inter alia, "any interference in the environment related to transformation or change of use of the site." Any such “operation”, likely to have significant effects on the environment, is subject to a mandatory assessment and evaluation, also subjected to the general public.</p> <p>(...) If the primary forests are forests in nature reserves, national parks and landscape parks and Natura 2000 sites, the rules are even more restrictive.”</p>

Question	YES / NO	Reference to scheme documentation
d) makes a contribution to long-term conservation, economic, and social benefits.		<p>“According to this definition [<i>the definition of primary forest in PEFC ST 1003:2010</i>], all primary forests are in nature reserves and national parks in Poland.</p> <p><b>Act on the protection of nature (2004), no. 92, item 880:</b></p> <p>“Art 15.1. In national parks and nature reserves forbidden is: (...) 6) the use, destruction, willful damage, pollution and changing natural objects, sites and resources, and wildlife components; (...)</p> <p>9) destroy of the soil or change of the intended use and/or use of land;”</p> <p><i>Two issues are found:</i></p> <ul style="list-style-type: none"> <li>• <i>Although PEFC Polska refers to applicable legislation in relation to public consultation in relation to conversion of forest, these references were not provided and could therefore not be assessed.</i></li> <li>• <i>No reference was found that in justified circumstances the conversion shall (only) entail a small proportion of forest type, appropriate to the Polish context.</i></li> </ul> <p><i>Observation: The word ‘and’ is missing at the end of a). Although grammatically not incorrect, leaving out the ‘and’ at the first bullet risks potential misinterpretation. Please note that PEFC explicitly adds the word ‘and’ at the end of each justification issue, because of the sensitivity of this requirement.</i></p>
5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.1.10. Converting land into forest land shall take into consideration increasing its ecological, social or economic value”</p>
<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.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.2.1. Forest management planning shall aim to shape the structure of a forest to ensure the continued sustainability of its (...) vitality, health (...) and to restore degraded forest ecosystems to the extent possible with available silviculture techniques.”</p>





Question	YES / NO	Reference to scheme documentation
5.2.2 Health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.2.2. Health and vitality of forests shall be periodically monitored, especially key biotic, abiotic and anthropogenic factors that potentially affect the health and vitality of forest ecosystems.</p> <p>A. Does the certified body monitor the threats mentioned above? Yes/No (the certified body shall present evidence of this).</p> <p>B. The area of tree stands damaged by game animals in each of the past five years (ha).</p> <p>C. The area of tree stands damaged by insects in each of the past five years (ha).</p> <p>D. The area of tree stands damaged by fungi in each of the past five years (ha).</p> <p>E. The area of tree stands damaged by fire in each of the past five years (ha).</p> <p>F. The area of tree stands damaged by wind and other abiotic factors in each of the past five years (ha).”</p>
5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems shall take into consideration the effects of naturally occurring fire, pests and other disturbances.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.2.2. Health and vitality of forests shall be periodically monitored, especially key biotic, abiotic and anthropogenic factors that potentially affect the health and vitality of forest ecosystems.</p> <p>4.2.3. Maintaining the health and vitality of forest ecosystems shall take into consideration the influence of biotic and abiotic factors, especially the gradation of insects and other naturally occurring disturbances, to the extent that these do not impair the sustainability of forest resources.”</p>
5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.2.4. Forest management plans shall specify ways and means to minimise the risk of degradation and damage to forest ecosystems. Forest management planning shall make use of those tools set up to support these activities.”</p>
5.2.5 Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.2.5. Forest management practices shall make the maximum use of natural generative processes of forests and use preventive biological measures to the extent possible and</p>



Question	YES / NO	Reference to scheme documentation
<p>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.</p>		<p>economically feasible. One shall strive to achieve and maintain adequate genetic, species and structural diversity to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and to strengthen natural regulative mechanisms.”</p>
<p>5.2.6 Lighting of fires shall be avoided and is only permitted if it is necessary for the achievement of the management goals of the forest management unit.</p>	YES	<p><b>PEFC PL 1003:2012:</b>                      “4.2.6. Lighting of fires shall be avoided in forests. This is only permitted if it is necessary for the achievement of the management goals of the forest management unit.”</p>
<p>5.2.7 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied. The spillage of oil during forest management operations or the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.</p>	YES	<p><b>PEFC PL 1003:2012:</b>                      “4.2.7. Appropriate forest management practices such as reforestation and afforestation with tree species suited to site conditions and the use of tending, harvesting and transport techniques that minimise tree and/or soil damage 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 collected and stored in designated areas and removed in an environmentally-responsible manner.”</p>
<p>5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.</p>	YES	<p><b>PEFC PL 1003:2012:</b>                      “4.2.8. The use of pesticides in forests shall be limited to situations where they are needed to maintain a forest’s sustainability; appropriate alternative measures shall be used to protect the forest.”</p>

Question	YES / NO	Reference to scheme documentation
<p>5.2.9 The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.2.9. The use of pesticides containing active substances classified by the World Health Organization as Type 1A and 1B pesticides is allowed only in cases when the forest’s sustainability is threatened.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The very extensive reference in this case is obligatory in the State Forests Instruction of Forest Protection (<a href="http://www.lasy.gov.pl/publikacje/copy_of_gospodarka-lesna/ochrona_lasu/instrukcja-ochrony-lasu-tom-i">http://www.lasy.gov.pl/publikacje/copy_of_gospodarka-lesna/ochrona_lasu/instrukcja-ochrony-lasu-tom-i</a>). The instruction extensively describes alternative/biological methods of forest protection and rules for their use.”</p> <p>“Instruction of Forest Protection, obligatory in the State Forests, extensively describes alternative/biological methods of forest protection and rules for their use.</p> <p>The State Forests Instruction of Forest Protection says that:</p> <p>“Activities in the field of forest protection include: [...]”</p> <p>c) the use of environmentally friendly techniques and technologies, not causing damage to the soil, vegetation, animal biotopes, etc .;</p> <p>d) the restriction (limitation) of chemical control methods for biological, mechanical and biotechnical methods;</p> <p>(...) f) the use of focal-complex method of forest protection, especially in areas of outbreaks of leaf-eating insects.”</p>
<p>5.2.10 Pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.2.10. 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.”</p>
<p>5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p>



Question	YES / NO	Reference to scheme documentation
be implemented with proper equipment and training.		"4.2.11. During the use of pesticides, the instructions given by the pesticide producer shall be followed (from the product's label) and be applied with the proper equipment and training."
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	YES	<b>PEFC PL 1003:2012:</b> "4.2.12. Fertilisers shall be used in a controlled manner and with due consideration for the environment."
<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.	YES	<b>PEFC PL 1003:2012:</b> "4.3.1. Forest management planning shall aim to maintain the capability of being able to benefit from all the functions of a forest on a sustainable basis."
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<b>PEFC PL 1003:2012:</b> "4.3.2. Forest management planning shall aim to achieve optimal economic performance taking into account available market studies and possibilities for new markets 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.	YES	<b>PEFC PL 1003:2012:</b> "4.3.3. Forest management plans (or their equivalents) shall take into account the different uses or functions of the managed forest area." <b>Additional explanation provided by PEFC Polska:</b> "According to the regulation of the Ministry of the Environment of 12 November 2012 on the specific conditions and procedures for the preparation of the management plan, simplified management plan and inventory of the forest "§ 1. 1. In preparing the management plan, a simplified management plan and inventory of the forest must be taken into account: 1) the requirements of breeding, protection devices, fire protection and use of the forest; 2) the requirements of nature and landscape protection and biodiversity conservation;



Question	YES / NO	Reference to scheme documentation
		<p>3) the need for national defence and security;</p> <p>4) principles of forest management in protective forests;</p> <p>5) planned in the local legislative acts way of management of forest and its surroundings;</p> <p>6) the need for rational management and conservation of water resources.”</p> <p>According to the obligatory in the State Forests Instruction of Forest Planning:</p> <p>“The preparation of the management plan also needs to take into account the relevant requirements contained in other laws and regulations governing matters of management planning and environmental protection, including laws: the protection of the environment act, nature conservation act, spatial planning law, geodetic and cartographic law, agriculture and forestry land protection law, fire protection act, hunting low, water law, act on the protection and conservation of monuments, act on prevention of environmental damage and their repair, act the provision of information about the environment and its protection, public participation in environmental protection and impact assessments environment”</p> <p>and further:</p> <p>“The Instruction of Forest Planning [...] is an act of internal standardization in the State Forests ordering the scope, form and methods of documentation for the technical implementation of the forest management plan in accordance with the laws and regulations issued under the laws and the relevant regulations of the Director General of State Forests in matters relating to forest management (including the Principles of Silviculture and Instruction of Forest Protection and Instruction for fire protection on forest areas).”</p>
<p>5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.3.4. Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.”</p>
<p>5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p>



Question	YES / NO	Reference to scheme documentation
<p>way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.</p>		<p>“4.3.5. Activities related to forest management shall be carried out in a time and manner that does not limit the productive capacity of the forest. Damage to retained stands and trees, as well as degradation to the forest soil shall especially be avoided.”</p>
<p>5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.</p>	NO	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.3.6. Harvesting levels of both wood and non-wood forest products shall ensure sustainability in the long term, and optimum use shall be made of the harvested forest products.”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The working group has just simplified this standard, and its sense remained unchanged. The term "sustainability" means also – keeping nutrient balance.</p> <p>However, a lot of forest management rules, established in forest legal framework, is related to the determination of the size of harvesting so as not to disturb the forest ecosystem (including the minimum size of clearcuts).”</p> <p><i>No reference was found that the optimum use shall be made <b>with due regard to nutrient off-take</b>. It should be noted that the nutrient off-take might easily be overlooked by either forest managers or Certifying Bodies. PEFC Polska provided several references of legislation, these however referred to protection of soil and water and did not notify nutrient off-take.</i></p>
<p>5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.</p>	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.3.7. Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-wood forest products, including hunting and fishing, shall be monitored and controlled.”</p> <p><i>The word “regulated” is missing. However, it is assumed that “controlled” implicitly includes “regulated”.</i></p>
<p>5.3.8 Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient</p>	YES	<p><b>PEFC PL 1003:2012:</b></p>

Question	YES / NO	Reference to scheme documentation
delivery of goods and services while minimising negative impacts on the environment.		"4.3.8. Adequate infrastructure such as roads, transport tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative effects on the environment."
<b>Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems</b>		
5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.	YES	<b>PEFC PL 1003:2012:</b> "4.4.1. Forest management planning shall aim to maintain, conserve and enhance biodiversity on genetic, species, ecosystem and landscape levels."
5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:  a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;  b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;  c) endangered or protected genetic in situ resources;  and taking into account  d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.	NO	<b>PEFC PL 1003:2012:</b> "4.4.2. Inventorying forest resources shall take into account ecologically important forest areas (including areas set aside for nature conservation) containing significant concentrations of:  a. protected, rare, sensitive or representative forest ecosystems (especially wetland habitats) and ecotone zones;  b. areas containing endemic species and habitats of endangered species, as defined in recognised reference lists;  c. endangered or protected genetic in situ resources.  Planning forest management activities shall take into account the conservation of the valuable natural resources in the areas mentioned above.  (...) B. Are there instructions developed to preserve the above mentioned resources (plans/conservation activities, management guidelines)? Yes/No (if not, why – lack of such a need, beyond the competence of the certified body, etc.).  C. Change in the area of forest included in the Natura 2000 network in the past five years (ha).  D. Change in the area of forest nature reserves (including areas under strict protection) in the past five years (ha).  E. Change in the area of forest included in protected landscape areas in the past five years (ha).  F. Change in the area of forest landscape parks in the past five years (ha).  G. Change in the area of forest nature-landscape areas in the past five years (ha).



Question	YES / NO	Reference to scheme documentation
		<p>H. Change in the area of forest ecological use sites in the past five years (ha).</p> <p>I. Natural monuments (registry number and changes that have taken place with respect to natural monuments in the past five years).</p> <p>J. Change in the area of forest sites with documented non-living natural resources in the past five years (ha).”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The working group has just simplified this standard, and its sense remained unchanged. The inventory is a broader concept and also means identifying and mapping.”</p> <p>“The Instruction of Forest Planning contains a detailed mandatory instruction of mapping of the ecologically important forest areas as follows:</p> <p>“6.1.4. Overview map or situational-review map of protected areas and forest functions.</p> <p>§ 73. 1. Overview map or situational-review map of protected areas and forest functions shall be based on a matrix of forest map (basically a scale of 1 : 25 000), or a situation map area within the territorial scope of a forest district (basically a scale of 1: 50 000 ). Review or situational-review mapping of protected areas and functions is based on an appropriate addition inscriptions and signs, coloring borders and background of forest protected areas according to their functions, including:, including:</p> <ol style="list-style-type: none"> <li>1) the boundaries of national parks and national parks buffer zones;</li> <li>2) the boundaries of reserves, lagging reserves and planned reserves;</li> <li>3) the boundaries of the Natura 2000 areas;</li> <li>4) recognized borders (set by the regional directors of environmental protection documents and confirmed on the ground) of refuges, natural habitats and stands of plants or animals which are objects of protection, that have been assigned a Natura 2000 site; in the absence of data on the location of the object of protection in the area code is valid of designation of the subject of protection, relating to the whole designated Natura 2000;</li> <li>5) the boundaries of protected forests with the distinction of leading category of protection;</li> <li>6) the boundaries of parks and protected landscape areas and its buffer zones;</li> </ol>



Question	YES / NO	Reference to scheme documentation
		<p>7) the boundaries or symbols: forest national monuments, ecological, geological points of interest, nature-landscape and surface forms of natural monuments;</p> <p>8) symbol and the name of the forest promotion complexes, entered in the title of the map, the name of a forest district;</p> <p>9) the boundaries or symbols: resorts, excluded seed stands and important natural and cultural peculiarities;</p> <p>10) sets the boundaries or symbols stands for the same tasks protective designated for nature conservation program.”</p> <p><i>The wording “take into account the conservation of the valuable natural resources” does insufficiently ensure the (pro-active) <b>protection and/or conservation</b> of these areas.</i></p>
<p>5.4.3 Protected and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p>	<p>NO</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.4.3. Protected and endangered plant, animal and fungus species shall not be exploited in a manner that is against the law.</p> <p>A. Does the eventual exploitation of protected and endangered species comply with the law? Yes/No (the certified body shall present its permits).”</p> <p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“In this case the exploitation means the catch of individual animals for scientific purposes (only in very limited cases, after authorization by the relevant authorities). Polish law is very demanding when it comes to protecting protected and endangered species”</p> <p>“Protected and endangered plant and animal species cannot be exploited for commercial purposes in Poland.</p> <p>According to act of 16 April 2004 on the protection of nature (Journal of Laws 2004, no. 92, item 880):</p> <p>Art. 117. 1. The management of resources of wild plants, animals and fungi and genetic resources of plants, animals and fungi utilised by man should provide their durability, optimum size and conservation of genetic diversity, in particular by:</p> <p>1) the protection, maintenance and rational use of natural and semi-natural ecosystems, including forests, bogs, marshes, grasslands, salt marshes, coastal cliffs and dunes, line the</p>



Question	YES / NO	Reference to scheme documentation
		<p>banks of the waters of river valleys, sources and springs, as well as rivers, lakes and marine areas, and habitats as well as refuges of plants, animals and fungi;</p> <p>2) creating the conditions for the propagation and spread of endangered plants, animals and fungi, and protecting and restoring natural habitats and refuges, as well as the protection of animal migration routes.”</p> <p><i>The PEFC requirement does not allow for exceptions, even not when national legislation allows for exceptions. The references insufficiently ensure that protected and endangered species shall never be exploited for commercial purposes.</i></p>
<p>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.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.4.4. Forest management shall ensure the regeneration of forest resources preferably through natural processes where this is possible and justified.”</p>
<p>5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.4.5. For reforestation and afforestation, native species and local ecotypes that are welladapted to habitat conditions shall be chosen. The only foreign species that can be introduced into the environment are those which are not listed in Polish law as endangering native species and habitats.</p> <p>Note: The Convention on Biological Diversity Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as the required guidance for avoidance of invasive species.”</p> <p><i>Observation: the wording of first sentence (“shall be chosen”) excludes the choice for any other species. This contradicts with the second sentence.</i></p>
<p>5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.4.6. Afforestation activities that contribute to the improvement and restoration of ecological corridors shall be promoted.”</p>

Question	YES / NO	Reference to scheme documentation
5.4.7 Genetically-modified trees shall not be used.	YES	<b>PEFC PL 1003:2012:</b> “4.4.7. Genetically-modified trees shall not be introduced into the environment.”
5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.	YES	<b>PEFC PL 1003:2012:</b> “4.4.8. Forest management practices shall, where justified, promote the structural diversity of forests, such as uneven-aged stands and mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.”
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	YES	<b>PEFC PL 1003:2012:</b> “4.4.9. When justified and in compliance with current law, traditional management practices that have created valuable ecosystems shall be supported on appropriate sites.”
5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to improve or maintain biological diversity.	YES	<b>PEFC PL 1003:2012:</b> “4.4.10. Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. 4.4.13. Standing and lying dead wood, old groves and special rare, native tree and shrub species shall be left to safeguard biological diversity, taking into account the potential effect on the health of tree stands and human safety in areas where people especially frequent.” <b>Additional explanation provided by PEFC Polska:</b> “There is a lot of practical obligatory measures specified in the instructions and rules of tending and harvesting operations (for example: limited size of clearcuts, obligatory remaining on biogroups of trees on clearcuts, etc.).”
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	YES	<b>PEFC PL 1003:2012:</b> “4.4.11. Infrastructure shall be planned and constructed in a way that maximally limits damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes migration patterns into consideration.”



Question	YES / NO	Reference to scheme documentation
reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.		<p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“The wording “rare, sensitive or representative ecosystems and genetic reserves” includes “rare, sensitive or representative species”. The wording “rare, sensitive or representative species” covers also “threatened or other key species”. The wording “infrastructure investments within the boundaries of the ecosystems mentioned above and their components” takes into account migration patterns as well.”</p>
5.4.12 With due regard to management objectives, measures shall be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.4.12. With due regard to management objectives and legal requirements, measures shall be taken to limit excessive pressure of game animal populations endangering forest regeneration and growth as well as on biodiversity.”</p>
5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.4.13. Standing and lying dead wood, old groves and special rare, native tree and shrub species shall be left to safeguard biological diversity, taking into account the potential effect on the health of tree stands and human safety in areas where people especially frequent.”</p>
<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.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.5.1. Forest management planning shall aim to maintain and enhance the protective functions of forests, protect against soil erosion, protect water resources and protect against the adverse effects of water.”</p>
5.5.2 Areas that fulfil specific and recognised protective functions for society shall be registered and mapped, and forest management	NO	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.5.2. Protection forests shall be inventoried and forest management plans (or their equivalents) shall take full account of these areas.”</p>



Question	YES / NO	Reference to scheme documentation
plans or their equivalents shall take these areas into account.		<p><b>Additional explanation provided by PEFC Polska:</b></p> <p>“In the Polish forestry practice, the inventory also means mapping.”</p> <p><i>No reference was found that forests with protective functions shall be mapped. There are references found in relation to protected areas, these do however not refer to non-protected forests that have protective functions for society (such as steep hill forests that protect against landslides). Although mapping might work well in practice, this shall also be required by the standard.</i></p>
5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.5.3. Special care shall be given to silvicultural operations on soils and in areas prone to erosion. Proper measures shall be taken to prepare the soil.</p> <p>4.4.12. With due regard to management objectives and legal requirements, measures shall be taken to limit excessive pressure of game animal populations endangering forest regeneration and growth”</p>
5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.5.4. Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quantity and quality of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.”</p>
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	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.5.5. Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the excessive introduction of soil into watercourses</p>



Question	YES / NO	Reference to scheme documentation
courses and river beds. Proper road drainage facilities shall be installed and maintained.		and water basins while preserving their natural level and function. Proper road drainage facilities shall be installed and properly maintained.”
<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.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.6.1. Forest management planning shall aim to respect the multiple functions of forests, give due regard to the role of forestry in rural development, and especially consider the situation in the labour market.”</p> <p><i>Although the wording of the last part of the criteria (“consider the situation in the labour market”) is a bit vague, it is assumed that in practice Forest Managers and Certifying Bodies will consider new opportunities for employment.</i></p>
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.6.2. Forest management shall promote the long-term health and well-being of local communities.”</p>
5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.6.3. Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, customary and traditional use of the given forest area shall be respected in accordance with current law.”</p> <p><i>PEFC Polska furthermore explained that there are no formally recognized customary and traditional rights related to the forest land in Poland. “Public forests are open with some restrictions, e.g. people are not allowed to set fire (except camping places) or collect wood for home use.”</i></p> <p><i>As the issues outlined in ILO 169 and UN Declaration on the Rights of Indigenous Peoples are not applicable in Poland, it is concluded that the specific PEFC requirements to these issues are not applicable for the Polish PEFC Scheme.</i></p>

Question	YES / NO	Reference to scheme documentation
<p>5.6.4 Forest management activities shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved or is in dispute there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>	<p>N.A.</p>	<p><i>According to PEFC Polska, there are no indigenous people, such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples. Therefore, it is concluded that the specific PEFC requirements to these issues are not applicable for the Polish PEFC Scheme.</i></p>
<p>5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.6.4. Adequate public access to forests shall be provided in compliance with respect for ownership rights and restrictions to access as the result of current law, taking into account the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.”</p>
<p>5.6.6 Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.6.5. Sites with historical, cultural or spiritual significance shall be protected and are managed in a way that takes due regard of the significance of the site.”  <i>It is assumed that there are no local communities in Poland that depend on the forests to meet their basic needs.</i></p>



Question	YES / NO	Reference to scheme documentation
<p>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.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.6.6. Forest management operations shall take into account all socio-economic functions, especially the recreational function and the aesthetic values of forests by maintaining, for example, varied forest structures. This shall be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources.”</p>
<p>5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.6.7. Forest owners and managers, forestry service employees and forestry contractors shall be provided with appropriate information and encouraged to keep up-to-date through continuous training on sustainable forest management as a precondition for all proper management planning and practices described in this document.”</p>
<p>5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.6.8. Forest management practices shall make the best use of local forest-related experiences and knowledge of forest owners, local government authorities, local community residents and NGOs.”</p>
<p>5.6.10 Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest</p>	<p>YES</p>	<p><b>PEFC PL 1003:2012:</b>                      “4.6.9. Forest management activities of the certified body shall provide education, as well as effective communication and consultation with local people and other stakeholders on sustainable forest management. Appropriate mechanisms shall be provided for responding to complaints and resolving disputes relating to forest management between forest managers and local people.”</p>



Question	YES / NO	Reference to scheme documentation
management between forest operators and local people.		
5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	YES	<b>PEFC PL 1003:2012:</b> “4.6.10. 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.”
5.6.12 Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.	YES	<b>PEFC PL 1003:2012:</b> “4.6.11. Working conditions shall be safe, and training in health and safety at work shall be provided to all those assigned to a task in forest operations.”
5.6.13 Forest management shall comply with fundamental ILO conventions.	YES	<b>PEFC PL 1003:2012:</b> “4.6.12. Forest management shall comply with fundamental International Labour Organization (ILO) conventions.”
5.6.14 Forest management shall be based inter-alia on the results of scientific research. Forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.	YES	<b>PEFC PL 1003:2012:</b> “4.6.13. Forest management shall also be based on the results of scientific research. The certified body shall contribute to the development of science and data collection related to sustainable forest management.”
<b>Criterion 7: Compliance with legal requirements</b>		
5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected	YES	<b>PEFC PL 1003:2012:</b> “2. Main normative references The criteria contained herein are in accordance with the following laws in force in Poland:



Question	YES / NO	Reference to scheme documentation
and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.		<p>21. Convention on International Trade in Endangered Species of animals and plants threatened with extinction, prepared in Washington, D.C. on 3 March 1973 (CITES) (Journal of Laws 1991, no. 27, item 112).</p> <p>4.7.1. Forest management shall comply with legislation, especially laws related to: forest management practices; nature and environmental protection; property ownership, tenure and land-use rights for indigenous people; health, health and safety at work issues; and the payment of charges and taxes.”</p> <p><i>Observation: The wording of 4.7.1. is repetitive (“health, <b>health</b> and safety”). It is assumed that this must be “health, <b>labour</b> and safety”.</i></p>
5.7.2 Forest management shall provide for adequate protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	<p><b>PEFC PL 1003:2012:</b></p> <p>“4.7.2. The certified body shall guarantee the proper protection of the forest from such activities as the theft of wood, poaching, illegal logging, illegal land use, arson, and other illegal activities.”</p>



## Part IV: PEFC Standard and System Requirement Checklist for Certification And Accreditation Procedures

### 1 Scope

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

### 2 Checklist

No.	Question	Reference to PEFC PROCEDURES	YES / NO	Reference to scheme documentation
<b>Certification Bodies</b>				
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	YES	<b>PEFC PL 1002:2013, 4.1:</b> “PEFC certifications shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making bodies or in forest management and are independent of the entity being certified.”
2.	Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 3.1	YES	<b>PEFC PL 1002:2013, 4.1:</b> “1) The certification body carrying out forest management certification shall fulfil requirements defined in: a) PN-EN ISO/IEC 17021 if the certification is carried out as a management system certification”
3.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic,	Annex 6, 3.1	YES	<b>PEFC PL 1002:2013, 4.1:</b> “3) The certification body carrying out forest management certification shall have technical competence in forest management, its economic, social and environmental impacts, and forest certification criteria.”



No.	Question	Reference to PEFC PROCEDURES	YES / NO	Reference to scheme documentation
	social and environmental impacts, and on the forest certification criteria?			
4.	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 certification?	Annex 6, 3.1	YES	<b>PEFC PL 1002:2013, 4.1:</b> “The certification body shall have a good understanding of the national PEFC system for which it carries out certification (forest or chain of custody).”
5.	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 certification?	Annex 6, 3.2	YES	<b>PEFC PL 1002:2013, 4.2:</b> “Certification bodies have the responsibility to use competent auditors that have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification.”
6.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	YES	<b>PEFC PL 1002:2013, 4.2:</b> “The auditors shall fulfil the general criteria for quality and environmental management systems auditors as defined in PN-EN ISO 19 011 and also given in ISO Guide 65 (PN-EN 45011).”
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [This is not an obligatory requirement]	Annex 6, 3.2	NO	



No.	Question	Reference to PEFC PROCEDURES	YES / NO	Reference to scheme documentation
<b>Certification procedures</b>				
8.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “The certification body shall have established internal procedures for forest management certification”
9.	Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “The applied certification procedures shall be compatible (relative to the scope of the work being carried out) with the requirements defined in the following documents: a) PN-EN ISO/IEC 17021, if the certification is carried out as management system certification, b) ISO Guide 65 (PN-EN 45011), if the certification is carried out as a product certification (the term “product” is used in its broadest sense and also includes processes and services).”
10.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “The applied auditing procedures shall fulfil or be compatible with the requirements of PN-EN ISO 19011.”
11.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “the certification body: a) informs the PEFC Polska Council about all issued forest management and chain of custody certificates and all changes concerning the validity and scope of these certificates,”



No.	Question	Reference to PEFC PROCEDURES	YES / NO	Reference to scheme documentation
12.	Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “the certification body: b) carries out control of PEFC logo use if the certified entity is a PEFC logo user.”
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “The maximum period for surveillance audits is 12 months”
14.	Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “the maximum period for reassessment audits is 3 years for both forest management and chain of custody certifications.”
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “Summaries of certification reports shall be publicly available.”
16.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	<b>PEFC PL 1002:2013, 5:</b> “The audit evidence to determine the conformity with the forest management standard shall include (to the extent possible) relevant information from external parties (e.g. government agencies, social groups, local government authorities, etc.) as appropriate.”
17.	Does the scheme documentation include additional requirements for certification procedures? [This is not an obligatory requirement]	Annex 6, 4	NO	



No.	Question	Reference to PEFC PROCEDURES	YES / NO	Reference to scheme documentation
<b>Accreditation procedures</b>				
18.	Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	Annex 6, 5	YES	<p><b>PEFC PL 1002:2013, 7:</b></p> <p>“Certification bodies carrying out forest management certification shall be accredited by the Polish Accreditation Centre to ensure the credibility of the certification work.”</p> <p><i>Observation: The clause narrows the option provided by PEFC International, in the sense that other national accreditation bodies are allowed under the PEFC International requirement, whereas they are excluded in the Polish Scheme. It is however remarkable that the Polish Procedure for PEFC Notification of Certification Bodies, Chapter 3 reads: “The certification body (...) shall (...) have a valid accreditation certificate issued by the Polish Centre for Accreditation (...) or by a national accreditation body from another country which is also a member of the IAF”.</i></p>
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES	<p><b>PEFC PL 1002:2013, 7:</b></p> <p>“Each accredited certificate shall have an accreditation number and the name of the relevant accreditation body.”</p>
20.	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	Annex 6, 5	YES	<p><b>PEFC PL 1002:2013, 7:</b></p> <p>“Accreditation bodies shall be a member of the International Accreditation Forum (IAF) or a member of IAF’s special recognition regional groups and implement procedures described in ISO/IEC 17011 and other documents recognised by the above organisations.”</p>



No.	Question	Reference to PEFC PROCEDURES	YES / NO	Reference to scheme documentation
	documents recognised by the above mentioned organisations?			
21.	Does the scheme documentation require that certification body undertake forest management certification as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	YES	<p><b>PEFC PL 1002:2013, 7:</b></p> <p>“The certification body shall undertake forest management or/and chain of custody certification as “accredited certifications”.</p> <p>The certification body carrying out forest management certification based on PEFC PL 1003 shall be accredited in accordance with the PN-EN ISO/IEC 17021.”</p>
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES	<p><b>PEFC PL 1002:2013, 8:</b></p> <p>“Certification bodies operating forest management and/or chain of custody certification within the framework of the PEFC Polska Council Forest Certification Scheme shall be recognised by the PEFC Polska Council.</p> <p>A request to be recognised as a certification body shall include documents verifying that the entity fulfils the qualifications criteria of a certification body set out in chapter 6 of this document and is required to inform the PEFC Polska Council of:</p> <ul style="list-style-type: none"> <li>a) all changes in the certification body relating to the qualifications criteria (legal status, audit procedures, accreditations, etc.),</li> <li>b) awarded, suspended and withdrawn certificates,</li> <li>c) the entities being certified (name, type of certificate, current size of the certified forest, volume of certified production).”</li> </ul>
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES	<p><b>PEFC PL 1002:2013, 8:</b></p> <p>“The PEFC Polska Council recognition conditions shall not discriminate against certification bodies or create trade obstacles for certified services.”</p>





## **Part V: PEFC Standard and System Requirement Checklist for System Specific Chain of Custody Standards**

### **1 Scope**

Part V is used for the assessment of scheme specific chain of custody standards against PEFC ST 2002:2010 (Chain of Custody of Forest Based Products - Requirements).

### **2 Checklist**

Not applicable. According to the Scheme Description – The Polish PEFC Scheme, “Chain of custody certification is carried out according to international normative PEFC ST 2002:2013 Chain of Custody – Requirements.”



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

### 1 Scope

Part VI is used for the assessment of requirements for the administration of PEFC schemes outlined in PEFC GD 1004:2009, Administration of PEFC scheme.

### 2 Checklist

No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
<b>PEFC Notification of certification bodies</b>				
1.	The notifying body shall have written procedures for the PEFC notification which ensure that:			
1a.	the PEFC notified certification body is meeting the PEFC Council's and PEFC endorsed scheme's requirements for certification bodies,	Section 5.1a	YES	<p><b>Procedure for PEFC Notification of Certification Bodies, Chapter 3:</b>                      “The certification body applying for PEFC notification from IBL shall:                      - have a valid accreditation certificate (...)                      For forest management system certification, the accreditation shall be issued against ISO/IEC 17021 (...) and the scope of the accreditation shall explicitly include the PEFC PL 1003 Sustainable forest management - requirements;                      For chain of custody certification, the accreditation shall be issued against ISO Guide 65 (...) and the scope of the accreditation shall explicitly include PEFC ST ST 2002:2013: Chain of custody – requirements;”</p> <p><b>Procedure for PEFC Notification of Certification Bodies, Appendix II:</b>                      “Article 2: Responsibilities of the PEFC Polska Notified Certification Body                      The PEFC Polska Notified Certification Body is obliged to:                      1. Have and keep valid accreditation issued in compliance with PEFC PL 1002 Certification and accreditation procedures and to inform the IBL immediately and about any changes in the accreditation.”</p>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
1b.	the scope of the PEFC notification, i.e. type of certification (forest management or chain of custody certification), certification standards and the country covered by the notification, is clearly defined,	Section 5.1b	YES	<p><b>Procedure for PEFC Notification of Certification Bodies, Chapter 3:</b></p> <p>“The certification body applying for PEFC notification from IBL shall:</p> <ul style="list-style-type: none"> <li>- be a legal entity, within Poland;</li> <li>- if outside Poland, be a legal entity in the country concerned and be registered by an accreditation body, which is a member of the International Accreditation Forum (IAF);</li> <li>- have a valid accreditation certificate (...)</li> </ul> <p>For forest management system certification, the accreditation shall be issued against ISO/IEC 17021 (...) and the scope of the accreditation shall explicitly include the PEFC PL 1003 Sustainable forest management - requirements;</p> <p>For chain of custody certification, the accreditation shall be issued against ISO Guide 65 (...) and the scope of the accreditation shall explicitly include PEFC ST ST 2002:2013: Chain of custody – requirements;”</p> <p><b>Procedure for PEFC Notification of Certification Bodies, Appendix II, preamble:</b></p> <p>“Whereas the PEFC Polska Notified Certification Body is to be granted a PEFC Polska notification and will be allowed to issue the PEFC Council recognised chain of custody certificates (...) to organisations which are registered in Poland.”</p>
1c.	the PEFC notification may be terminated by the notifying body in the case of the certification body’s non adherence to the conditions of the PEFC notification or in the case of the cancellation of the contract between the PEFC Council and the authorised body,	Section 5.1c	YES	<p><b>Procedure for PEFC Notification of Certification Bodies, Chapter 6:</b></p> <p>“The PEFC Polska notification can be terminated or suspended by the Forest Research Institute, after PEFC Polska Council suggestion, if the notification contract is violated.”</p> <p><b>Procedure for PEFC Notification of Certification Bodies, Appendix II:</b></p> <p>“Article 4: Contract Termination</p>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
				<p>1. The IBL as well as the PEFC Polska Notified Certification Body may terminate the contract with three-months prior notice by registered letter.</p> <p>2. PEFC notification may be terminated in the case of cancellation of the contract between the PEFC Council and PEFC Polska.”</p> <p><i>Observation: The contract termination clause implicitly provides an opportunity to terminate the contract without any reason, which is considered remarkable.</i></p>
1d.	the PEFC notification is based on a written contract between the notifying body and the PEFC notified certification body,	Section 5.1d	YES	<p><b>Procedure for PEFC Notification of Certification Bodies, Chapter 3:</b></p> <p>“The certification body applying for PEFC notification from IBL shall:</p> <ul style="list-style-type: none"> <li>- be prepared to sign a PEFC Polska Notification Agreement with Forest Research Institute (Appendix II);”</li> </ul> <p><i>Appendix II presents the notification agreement.</i></p>
1e.	the PEFC notified certification body provides the notifying body with information on certified entities as required by the PEFC Registration System,	Section 5.1e	YES	<p><b>Procedure for PEFC Notification of Certification Bodies, Chapter 5:</b></p> <p>“The PEFC Polska notified certification body shall:</p> <ul style="list-style-type: none"> <li>- provide the Forest Research Institute , without delay, with information on every certificate it issues to an organization in the Poland and/or information on any changes to already issued certificates. The range of data is specified by IBL in accordance with the specifications of content and format outlined in the PEFC Council’s Internal Rules for the PEFC Registration System [GLI4-2003];”</li> </ul>
1f.	the PEFC notification does not include any discriminatory measures, such as the certification body’s country of origin, affiliation to an association, etc.	Section 5.1f	YES	<p><b>Procedure for PEFC Notification of Certification Bodies, Chapter 3:</b></p> <p>“The certification body applying for PEFC notification from IBL shall:</p> <ul style="list-style-type: none"> <li>- be a legal entity, within Poland;</li> <li>- if outside Poland, be a legal entity in the country concerned and be registered by an accreditation body, which is a member of the International Accreditation Forum (IAF);”</li> </ul>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
				<i>Although not explicitly stated, the procedures do not include any discriminatory measures.</i>
2.	The notifying body may charge a fee for the PEFC notification. The authorised body shall inform the PEFC Council about the level of its PEFC notification fees, when requested.	Section 5.2	YES	<p><b>Procedure for PEFC Notification of Certification Bodies, Chapter 5:</b></p> <p>“The PEFC Polska notified certification body shall:</p> <ul style="list-style-type: none"> <li>- pay the Forest Research Institute annual notification fee for every issued certificate based on an invoice issued by the Forest Research Institute. (...)</li> </ul> <p>The level of the notification fee is set out in Appendix III”</p> <p><i>The fees could be found in Appendix III, which are area dependent for forest management certifications and turnover dependent for forest related industries certifications.</i></p>
<b>PEFC Logo usage licensing</b>				
3.	Coverage of the PEFC Logo usage licence			
3a.	<p>The PEFC Logo usage licence shall be issued to an individual legal entity based on the requirements of PEFC ST 2001:2008.</p> <p>Note: Where the PEFC certification covers several legal entities, for example where group and regional forest certification covers a number of forest owners / managers (independent legal entities) or where multi-site certification covers several sites which are legally independent entities, each legal entity shall apply for its own PEFC Logo usage licence.</p>	Section 6.1.1	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL):</b></p> <p>“1 Scope</p> <p>This document is based on PEFC ST 2001:2008 (PEFC Logo usage rules – requirements) and PEFC GD 1004:2009 (Administration of PEFC scheme).</p> <p>The Forest Research Institute (IBL), the PEFC National Governing Body in Poland, undertakes only to issue licenses to the following user groups as described in PEFC ST 2001:2008 (PEFC Logo usage rules – requirements):</p> <p>User group B: Forest owners and managers</p> <p>User group C: Forest Related Industries (off and on product usage)</p> <p>User group D: Other Actors (organisations or Bodies willing and permitted to promote or advertise PEFC for educational purposes (Off product usage only)</p>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
				<p>The Forest Research Institute issues licenses to organisations under User Groups B, C and D, which are legally registered in Poland.</p> <p>The Forest Research Institute may issue a PEFC Logo usage multi-licence to a holder of a multi-site chain of custody certificate, which covers the whole or a part of the multisite organisation.</p> <p>Note: Where the PEFC certification covers several legal entities, for example where group and regional forest certification covers a number of forest owners / managers (independent legal entities) or where multi-site certification covers several sites which are legally independent entities, each legal entity shall apply for its own PEFC Logo usage licence.”</p>
3b.	<p>The PEFC Council and authorised bodies may issue a PEFC Logo usage multi-licence to a holder of a multi-site chain of custody certificate, which covers the whole or a part of the multisite organisation provided that:</p> <p>a) the central office and the sites are a part of a single legal entity or</p> <p>b) the central office and the sites are a part of a single company with a single management and organisational structure.</p> <p>Note: The multi-licence cannot be issued to a multi-site chain of custody certificate holder where the sites are independent legal entities without a single management and organisational structure and where the multi-site organisation has only been</p>	Section 6.1.2	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL):</b></p> <p>“1 Scope</p> <p>The Forest Research Institute may issue a PEFC Logo usage multi-licence to a holder of a multi-site chain of custody certificate, which covers the whole or a part of the multisite organisation provided that:</p> <p>a) the central office and the sites are a part of a single legal entity or</p> <p>b) the central office and the sites are a part of a single company with a single management and organisational structure.</p> <p>Note: The multi-licence cannot be issued to a multi-site chain of custody certificate holder where the sites are independent legal entities without a single management and organisational structure and where the multi-site organisation has only been created for the purpose of the PEFC certification.”</p>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
	created for the purpose of the PEFC certification.			
4.	The licensing body shall have written procedures for the PEFC Logo licensing which ensure that:			
4a.	the PEFC Logo usage licence is based on a written contract between the licensing body and the PEFC Logo user,	Section 6.2.1a	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL):</b></p> <p>“4 Conditions for issuance of license</p> <p>4.2 Special Conditions</p> <p>User group B: Forest owners and managers, shall</p> <p>b) sign the PEFC Logo Usage Contract with the Forest Research Institute</p> <p>User group C: Forest related industries, shall</p> <p>b) sign the PEFC Logo Usage Contract with the Forest Research Institute</p> <p>User category D: Other users, shall</p> <p>b) sign the PEFC Logo Usage Contract with the Forest Research Institute”</p> <p><i>Appendix 1 of the Guidelines of PEFC Polska contains the format of such a Contract.</i></p>
4b.	the PEFC logo user complies with the PEFC Logo usage rules (PEFC ST 2001:2008),	Section 6.2.1b	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL), Appendix 1:</b></p> <p>“Article 1 Definitions:</p> <p>1. The PEFC Logo Use Rules – Requirements - This is the PEFC International Standard (PEFC ST 2001:2008), which forms part of the contractual documentation and is found in the annex of this contract.</p> <p>Article 3: Responsibility of the Logo User</p> <p>1. The logo user is obliged to use the PEFC logo in accordance with the PEFC Logo Use Rules”</p>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
4c.	the scope of the PEFC Logo usage (logo usage groups) is clearly defined,	Section 6.2.1c	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL):</b></p> <p>“1 Scope</p> <p>The Forest Research Institute (IBL), the PEFC National Governing Body in Poland, undertakes only to issue licenses to the following user groups as described in PEFC ST 2001:2008 (PEFC Logo usage rules – requirements):</p> <p>User group B: Forest owners and managers</p> <p>User group C: Forest Related Industries (off and on product usage)</p> <p>User group D: Other Actors (organisations or Bodies willing and permitted to promote or advertise PEFC for educational purposes (Off product usage only)</p> <p>The Forest Research Institute issues licenses to organisations under User Groups B, C and D, which are legally registered in Poland.”</p>
4d.	the PEFC Logo usage licence can be terminated by the licensing body in the case of the PEFC Logo user’s non adherence to the conditions of the PEFC logo usage rules (PEFC ST 2001:2008) or in the case of cancellation of the contract between the PEFC Council and the authorised body,	Section 6.2.1d	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL), Appendix 1:</b></p> <p>“Article 6: Contract Termination</p> <p>3. The Forest Research Institute may terminate the contract without any consequences with the immediate effect, if there are reasons to believe that any of the terms of the contract or the PEFC Logo Use Rules are not being adhered to.</p> <p>5. The PEFC Logo usage license can be terminated in the case of cancellation of the contract between the PEFC Council and the Forest Research Institute.”</p>
4e.	where unauthorised use has taken place, the PEFC Logo usage licence provides for contractual penalty of one fifth of the market value of the products to which the	Section 6.2.1e	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL), Appendix 1:</b></p> <p>“Article 5: Penalty</p>





No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
	unauthorised logo use relates, unless the PEFC Logo user proves that such unauthorised use was unintentional. In the latter case, the penalty will be limited to 15,000 CHF.			<p>1. The Forest Research Institute may impose, in case of user group B and C, a contractual penalty of a Euro amount being one-fifth the market value of the products to which unauthorised on- or off-product logo use relates, unless the logo user proves that such unauthorised use was unintentional. In the latter case the penalty will be limited to 10,000 Euro.”</p> <p><i>Observation: the penalty limitation (€ 10,000) is lower than 15,000 CHF (against exchange rate of October 2014 approximately 12,000 CHF).</i></p>
5.	The licensing body shall have a mechanism for the investigation and enforcement of the compliance with PEFC Logo usage rules (PEFC ST 2001:2008) and shall take actions, including legal if necessary, to protect the PEFC Logo trademark.	Section 6.2.2	YES	<p><b>Issuance of PEFC Logo Usage Licenses by the Forest Research Institute (IBL), Appendix 1:</b></p> <p>“Article 6: Contract Termination</p> <p>2. The Forest Research Institute may revoke the contract temporarily with immediate effect while a suspicion of contravention of the contract or the PEFC Logo Use Rules is being investigated. In case of such suspicion, the Forest Research Institute shall send the logo user a written request for an explanation and notification of the temporary revocation of the contract. The temporary revocation shall remain in effect for a maximum period of one (1) month after the logo user has provided an explanation concerning the suspected misuse to the Forest Research Institute, which will examine the matter. The Forest Research Institute may reverse a decision on the temporary revocation of the contract when the logo user has implemented corrective measures approved by the Forest Research Institute and given the Forest Research Institute notification and appropriate proof that this has been done.</p> <p>Article 9: Other terms of the contract</p> <p>1. The Forest Research Institute reserves the right to carry out (by itself or to commission a third party to act on its behalf) an on-site inspection of logo user's operations if it has received a complaint by third party or if the Forest Research Institute has reasons to believe that the contract is being</p>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
				<p>contravened. The logo user shall bear responsibility for the costs of said inspection and any other detrimental effects.</p> <p>2. The logo user, in case of the group B and C, undertakes to enter an agreement with the certification body within three months of signing this contract (a copy to be sent to the Forest Research Institute) to that effect that, in conjunction with the audits conducted subsequent to signing this contract, certification body will examine the system by means of which the logo user keeps records of the production volumes marked with the PEFC logo and how the Logo is used on them. The certification body shall have a right to inform the Forest Research Institute of changes of which it is aware, without consulting the logo user.”</p>
<b>Requirements for administration of PEFC Scheme – Complaints and dispute procedures</b>				
6.	<p><b>Complaints and dispute procedures</b> The authorised bodies shall have written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme.</p>	Section 8.1	YES	<p><b>PEFC PL 1001:2012:</b> “9.3. Appeals, complaints and disputes relating to the governance and administration of the PEFC scheme In the case of objections put forward by any person or organization which relate to decision and/or the activities of PEFC Polska, following procedure shall be applied” <i>The procedures are further elaborated in the Standard.</i></p>
7.	Upon receipt of the complaint, the procedures shall provide for:			
7a.	acknowledgement of the complaint to the complainant,	Section 8.2a	YES	<p><b>PEFC PL 1001:2012, 9.3.:</b> “In the case of objections put forward by any person or organization which relate to decision and/or the activities of PEFC Polska, following procedure shall be applied: a) Complaints shall be addressed to in writing to the Board of Director of PEFC Polska;</p>

No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
				b) The complainant shall be informed in writing of the receipt or rejection of the complaint and the complaints procedure. Rejection of complaint shall be justified;”
7b.	gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint,	Section 8.2b	NO	<p><b>PEFC PL 1001:2012, 9.3.:</b></p> <p>“In the case of objections put forward by any person or organization which relate to decision and/or the activities of PEFC Polska, following procedure shall be applied:</p> <p>c) The office of PEFC Polska considers the complaint seeking solution and prepare a report containing the results of the analysis of the complaint and proposed solutions, and will send it to the Board of Directors of PEFC;</p> <p>d) On the basis of the recommendations prepared by the office of PEFC Polska, the Board of Directors of PEFC Polska decides on the complaint solution;</p> <p>e) (...)The decision of Board of Directors of PEFC Polska is binding.”</p> <p><i>The procedures insufficiently ensure the impartial evaluation, as the evaluation of complaints relating to decision and/or activities of PEFC Polska, are evaluated by the office of PEFC Polska and decisions are made by the Board of Directors of PEFC Polska, which are furthermore binding.</i></p>
7c.	formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties,	Section 8.2c	NO	<p><b>PEFC PL 1001:2012, 9.3.:</b></p> <p>“In the case of objections put forward by any person or organization which relate to decision and/or the activities of PEFC Polska, following procedure shall be applied:</p> <p>e) The Board of Directors of PEFC Polska informs the complainant in writing form on the outcome of the complaint solution process. The decision of Board of Directors of PEFC Polska is binding.”</p>



No.	Question	Reference to PEFC GD 1004:2009	YES / NO	Reference to application documents
				<i>No reference was found that PEFC Polska shall formally communicate the <b>complaint handling process</b> to the complainant. The references only ensure the communication of the <b>decision</b>.</i>
7d.	appropriate corrective and preventive actions.	Section 8.2d	YES	<p><b>PEFC PL 1001:2012, 9.3.:</b></p> <p>“In the case of objections put forward by any person or organization which relate to decision and/or the activities of PEFC Polska, following procedure shall be applied:</p> <p>c) The office of PEFC Polska considers the complaint seeking solution and prepare a report containing the results of the analysis of the complaint and proposed solutions, and will send it to the Board of Directors of PEFC;</p> <p>d) On the basis of the recommendations prepared by the office of PEFC Polska, the Board of Directors of PEFC Polska decides on the complaint solution;”</p>



## Annex 2 Results of Stakeholder Survey

As part of the general analysis of the Polish PEFC scheme, a survey has been carried out to receive additional information and evidence on the standard setting process. The stakeholder survey (questionnaire presented below) has been sent on 30 September 2014, by E-mail in English and Polish, to 83 stakeholders, based on a stakeholder list provided by PEFC Polska. That list contained about 100 stakeholders, from 16 stakeholders however no E-mail addresses were provided. Although the closing date for the survey was 20 October 2014, one of the responses was received after this date and is included in the assessment. In total 8 people filled out the questionnaire and sent it back to Form international. This group included representatives of state forest owners, people from the forest / wood related industry, an NGO-representative and a scientist. No private forest owners have answered the questionnaire.

Most of the respondents actively participated in the standard revision process. More than half of the respondents (5/8) were member of Working Group 1, and 1 respondent was member of Working Group 2. As a motivation to contribute to the revision of the Polish PEFC scheme, most respondents said it was important to them to represent their stakeholder group, to participate in the development of the Polish forestry sector and stay in line with conservation criteria.

In general the questions of the survey were answered positively. The information provided by the PEFC Polska secretariat, such as draft documents, invitations for meetings and minutes of meetings were efficiently spread (often by E-mail) amongst the members of the Working Groups. The content of those documents was considered relevant by the respondents. The composition of these groups was considered well balanced.

Respondents confirmed that relevant topics and comments from the public consultation were considered in the Working Groups in an objective and transparent way and their experience in general is that the process complies with the requirements. It seems that there haven't been any substantive or procedural complaints about the revision process.

The most important remarks and attention points of respondents and the response of the assessor are presented in the table below. Some of the remarks were provided in Polish and were translated with Google translate.



Remarks of the respondents	Response of the assessor
“We did not participate in the revision process, because we hadn't got an invitation or information about revision process.”	According to records of PEFC Polska ,this organization was on the list of identified stakeholders, including an E-mail address (which is different from the respondent's E-mail address). It could not be verified if they really received an invitation.
<i>Remark to the question about substantive or procedural complaints:</i> “Yes, there was a complaint about forest certification in Poland – several forest districts says that it doesn't make any sense.”	The complaint is a bit unclear. The assessor concluded this is a general complaint on certification and should not be considered a substantive or procedural complaint in relation to the revision process.
<i>Remark to the last question about aspects of the scheme that deserve further consideration:</i> “Yes, you can always improve something. In particular where the physical, social and economic environment are dynamic and subject to constant change.”	The remark indirectly stresses the need for regular revision. This is covered by the Polish PEFC Scheme.

The questionnaires have been answered in a positive way and from the few remarks that were made, the impression is that there were no major concerns about the standard revision process. Most respondents have been pleased with the way PEFC Polska has led the process and carried out her tasks so far.

## Stakeholders that were invited for the survey

<b>Authorities (public administration and local government)</b>	
1	Departament Leśnictwa i Ochrony Przyrody w Ministerstwie Środowiska (Dept. Forestry and Nat. Conservation, Ministry of Environment)
2	Office of Technical Inspection
3	Biuro Nasiennictwa Leśnego (forest reproductive material office)
4	Biuro Urządzania Lasu i Geodezji Leśnej
5	Centrum Koordynacji Projektów Środowiskowych
6	Generalna Dyrekcja Ochrony Środowiska (General Directorate for Environmental Protection)
<b>Forest owners/managers (State Forest Service)</b>	
7	DGLP
8	Forest District of Bystrzyca Kłodzka
9	Forest District of Jugów
10	Forest District of Jugów
11	Forest District of Legnica
12	Forest District of Miękinia
13	Forest District of Parczew
14	Forest District of Rudka
15	Forest District of Szczerba



16	Forest District of Wejherowo
17	General Directorate of State Forests
18	Kampinoski Park Narodowy (Kampinoski National Park)
19	Regional Directorate of State Forests Białystok
20	Regional Directorate of State Forests Gdańsk
21	Regional Directorate of State Forests Gdańsk
22	Regional Directorate of State Forests Gdańsk
23	Regional Directorate of State Forests Katowice
24	Regional Directorate of State Forests Kraków
25	Regional Directorate of State Forests Kraków
26	Regional Directorate of State Forests Kraków
27	Regional Directorate of State Forests Krosno
28	Regional Directorate of State Forests Łódź
29	Regional Directorate of State Forests Olsztyn
30	Regional Directorate of State Forests Olsztyn
31	Regional Directorate of State Forests Piła
32	Regional Directorate of State Forests Poznań
33	Regional Directorate of State Forests Radom
34	Regional Directorate of State Forests Szczecin
35	Regional Directorate of State Forests Szczecin
36	Regional Directorate of State Forests Toruń
37	Regional Directorate of State Forests Toruń
38	Regional Directorate of State Forests Warszawa
39	Regional Directorate of State Forests Warszawa
40	Regional Directorate of State Forests Wrocław
41	Regional Directorate of State Forests Zielona Góra
42	The Coordination Centre for Environmental Projects
<b>Forest Science / education</b>	
43	Institute of Dendrology Polish Academy of Sciences
44	Instytut Ochrony Środowiska - Państwowy Instytut Badawczy
45	Łódź University
46	SZKOŁA GŁÓWNA GOSPODARSTWA WIEJSKIEGO W WARSZAWIE WYDZIAŁ LEŚNY
47	Warsaw University of Life Sciences – SGGW
48	Wydział Leśny Uniwersytetu Przyrodniczego w Poznaniu
49	Wydział Leśny Uniwersytetu Rolniczego im. H. Kołłątaja w Krakowie
<b>Forest/wood related industry</b>	
50	Bastex Wolman Division
51	Polska Izba Gospodarcza Przemysłu Drzewnego (Polish economic chambre of Wood Industry)
52	Stowarzyszenie Inżynierów i Techników Leśnictwa i Drzewnictwa
53	Stowarzyszenie Przedsiębiorców Leśnych im. Mieczysława Wierzbickiego (Ass. Forest entrepreneurs)
<b>NGO</b>	
54	Association 'Woman of Forest'
55	Association of Foresters and Wood Technologists
56	Committee of Gallinaceous Bird Protection
57	Fundacja "Zielonej Ligi"



58	Fundacja Aeris Futuro
59	Fundacja Bieszczadzkiej Kolejki Leśnej
60	Fundacja Ekologiczna „Arka”
61	Fundacja Na Rzecz Leśnych Kolei Wąskotorowych
62	Fundacja Nasza Ziemia
63	Fundacja WWF Polska
64	Klub Przyrodników
65	Liga Ochrony Przyrody (Conservation League)
66	Local Association of Celestynów
67	Local Association of Celestynów
68	Polish Forest Society
69	Polski Związek Łowiecki (Polish hunting Association)
70	Polskie Towarzystwo Ochrony Przyrody „Salamandra”
71	Stowarzyszenie dla Natury "Wilk" (Wolf)
72	Stowarzyszenie Edukatorów Leśnych(Association of Forest educators)
73	Stowarzyszenie Ekologiczno-Kulturalne Klub Gaja
74	Stowarzyszenie Kobiet Lasu
75	Towarzystwo Przyjaciół Lasu
76	TOWARZYSTWO PRZYRODNICZE “BOCIAN” (stork)
77	Wildlife Protection League
78	Zieloni R.P. (The Greens of Republic of Poland)
<b>Private person</b>	
79	Piotr Aleksander Dubiel
<b>Unclear</b>	
80	Mazowiecki Zespól Parków Krajobrazowych
81	Polski Związek Zrzeszeń Leśnych
82	ZWIĄZEK LEŚNIKÓW POLSKICH PARKÓW NARODOWYCH (Union of National Park foresters)
83	Związek Stowarzyszeń Polska Zielona Sieć (Union of Associations Polish Green Network)





## The questionnaire

### Questionnaire for the revision process of the Polish PEFC Scheme

Indicate your answer by putting an **X** on the dotted line. Please explain your answers as much as possible by giving comments or remarks.

<p>1. What stakeholder category do you represent?</p>	<p>... Forest owner / manager (state)</p> <p>... Forest owner / manager (private)</p> <p>... Forest / wood related industry / business</p> <p>... Non-governmental organisation (forest / ecology)</p> <p>... Authorities (public administration or local government)</p> <p>... Forest science</p> <p>... Other:</p>
<p>2. Did you actively participate in the revision process ?</p> <p>If no, why not?</p>	<p>... Yes, as a member of WG 1 (revision of PEFC Polska's forest management standard)</p> <p>... Yes, as a member of WG2 (revision of remaining technical documents)</p> <p>... Yes, by providing comments during the Public consultation on the draft revised scheme</p> <p>... Other: ...</p> <p>... No participation, because: ....</p>
<p>3. a) <u>How</u> did you find out about the revision process?</p> <p>b) <u>When</u> were you invited to participate on the revision of the Polish PEFC Scheme?</p>	<p>... Newspaper or magazine</p> <p>... Website of ....</p> <p>... Personal letter or email</p> <p>... Other: ...</p> <p>Please indicate day, month and year: ..... / ..... / .....</p>
<p>4. What was your main concern and your interest to participate in the revision process?</p>	<p>Concern: .....</p> <p>Interest: .....</p>



<p>5. Did the organizers provide you with relevant material to participate in the scheme revision?</p>	<p>... Yes, because ....                  ... No, because ....                  ... I don't know                  Remarks:</p>
<p>6. In your opinion, have all stakeholders that are relevant to the revision process been proactively identified and invited, including disadvantaged stakeholders?</p>	<p>... Yes                  ... No, other stakeholders that should have been identified and invited: ....                  ... I don't know                  Comments or remarks:</p>
<p>7. a) Did the stakeholder representatives in <b>WG 1</b> (revision of the forest management standard) represent the range of interest in forest management in your country? If not, which other interest groups should have been involved?                  b) Did the <b>WG1</b>, to your opinion, have a <b>balanced</b> representation of various stakeholder categories?</p>	<p>... Yes                  ... No, other interest groups that should have been involved: .....                  ... I don't know                  ... Yes                  ... No, underrepresented stakeholder categories:.....                  ... I don't know</p>
<p>8. a) Did the stakeholder representatives in <b>WG 2</b> (revision of remaining technical documents) represent the range of interest in forest management in your country? If not, which other interest groups should have been involved?                  b) Did the <b>WG2</b>, to your opinion, have a <b>balanced</b> representation of various stakeholder categories?</p>	<p>... Yes                  ... No, other interest groups that should have been involved: .....                  ... I don't know                  ... Yes                  ... No, underrepresented stakeholder categories:.....                  ... I don't know</p>
<p>9. a) Are you aware of any substantive or procedural complaints related to the revision process, brought forward by you or any other stakeholder?                  b) In case of any complaints, have these been validated and objectively evaluated?</p>	<p>... Yes, there was a complaint about .....                  ... No                  ... I don't know                  ... Yes                  ... No                  ... I don't know                  Remarks:</p>



**Questions 10 – 17 are for Working Group members only.**

If you did participate in one of the Working Groups, please continue with question 10.

If you did NOT participate in one of the Working Groups, please continue with question 18.

<p>10. Did all stakeholders in your working group have expertise relevant to the subject matter?</p>	<p>... Yes ... No ... I don't know</p> <p>Remarks:</p>
<p>11. a) Have records (or minutes) been kept from WG meetings?</p> <p>b) How did you receive invitations for WG meetings and documents?</p> <p>c) Did you receive invitations for WG-meetings and documents <i>in a timely manner</i>?</p>	<p>... Yes ... No ... I don't know</p> <p>... By mail ... By E-mail ... By other means: ...</p> <p>... Yes ... No ... I don't know</p> <p>Remarks:</p>
<p>12. Have all <i>working draft documents</i> been available to all members of the Working Group?</p>	<p>... Yes ... No ... I don't know</p> <p>Remarks:</p>
<p>13. Have you been provided with meaningful opportunities to contribute to the development of the standard and submit comments to the working drafts?</p>	<p>... Yes ... No ... I don't know</p> <p>Remarks:</p>
<p>14. Have comments and views submitted by any member of your Working Group been considered in an open and transparent way?</p>	<p>... Yes ... No ... I don't know</p> <p>Remarks:</p>
<p>15. Has the public consultation of the scheme documentation lasted for at least 60 days?</p>	<p>... Yes ... No ... I don't know</p> <p>Remarks:</p>



<p>16. Have all comments received during the <i>public consultation</i> been considered in an objective manner by the WG?</p>	<p>... Yes. Please explain: .....</p> <p>... No. Please explain: .....</p> <p>... I don't know</p> <p>Remarks:</p>
<p>17. a) Was the decision of the Working Group to recommend the final draft for formal approval taken on the basis of <i>consensus</i>?</p> <p>b) In case no consensus was reached on certain issues, how was the issue resolved?</p>	<p>... Yes, the issue was resolved in the following way: .....</p> <p>... No, the issue was resolved in the following way: .....</p> <p>... I don't know</p> <p>Remarks:</p>

**To be answered by all stakeholders:**

<p>18. Do you believe any aspects of the Polish PEFC scheme deserve further consideration in this assessment?</p>	<p>... Yes. Please specify: ...</p> <p>... No</p> <p>... I don't know</p> <p>Remarks:</p>
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**Please return the answers latest by 20 October 2014.**

**You can direct your response by e-mail to:**

[c.naaijen@forminternational.nl](mailto:c.naaijen@forminternational.nl)

**Thank you for your time and cooperation**



## Annex 3 Results of International Consultation

The International Consultation has resulted in one response with four comments:

Comment	Assessor's response
<p><b>In PEFC PL 1001:</b></p> <p>- To add the requirement of the implementation of a stakeholder mapping</p>	<p>Requirement 4.2.1 of PEFC PL 1001 requires a stakeholder identification, which is in compliance with the PEFC requirement.</p>
<p><b>In PEFC PL 1003:</b></p> <p>- To add the requirement: « maps shall identify important biotopes and significant biodiversity areas; protection or conservation measures are implemented and clearly defined in management plan to comply with the international criteria 5.4.2. of PEFC ST 1003:2010;</p>	<p>The first issues is according the Assessor sufficiently ensured by applicable legislation.</p> <p>The second issue is identified as a non-conformity and mentioned in the report.</p>
<p>- To add the requirement: « protected and endangered species are not exploited for commercial purpose » in order to comply with criteria 5.4.3. of PEFC ST 1003:2010;</p>	<p>This relates indeed to a non-conformity which is mentioned in the report.</p>
<p>- To modify the requirement about pesticides: “The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available and the forest is threatened”;</p>	<p>Although the wording of the PEFC PL 1003 is different, it is concluded that the Forest Management standard, together with applicable legislation, will result in the situation prescribed in PEFC International's requirement.</p>



## Annex 4 Panel of Experts Comments

Three panel of experts members have commented on this assessment. Their comments are presented in the table below, including the responses from the consultant. Minor adaptations have been made to the text of the report as indicated in the consultant's responses.

Report chapter / Page	Consultant's report statement	PoE member comment	Consultant's response
General		The report is well structured and clear in content	Comment is clear.
General		The report is – in some parts – hard to follow (e.g. missing references or explanations), the layout could be clearer to better support the structure. It seems that the Polish Scheme is not well elaborated, however, the wording in some parts of the report as well as decisions (observation vs. non-conformity) need to be questioned (see below).	As far as possible and applicable, the assessor adjusted the report on clearly referenced issues, or else provided an explanation in this table. The Polish Scheme is relatively well elaborated, there are however some weaknesses in both the forest management standard structure and the process that receive most of the attention in the report, which might give the impression that the Polish Scheme is not well elaborated.
Acronyms/6		IBL is not mentioned. Used e.g. on page 138.	Updated in the report.
1. p.7	..." the revised scheme is conform the PEFC Council (PEFCC) requirements".	Is this correct English? the revised scheme is in conformity with requirements or the revised scheme conforms the requirements ?	Updated in the report.



1.2. p.7, 3.2. p.11, 4.2. p.17	PEFC IGD 1007, CoC, req., PCA	These acronyms are missing on the list of acronyms on p 6 (like most acronyms of PEFC documentation used in the report!)	Updated in the report.
Table 1.1, p.8 and Annex 1, Part I	Bylaws of PEFC Polska; First Revision of the Polish PEFC scheme; Invitation letter, dd 8th of February 2012:	These documents are referred as application documents in Annex, Part I, but they are not listed in table 1.1: “Documents used for the conformity assessment”. There is only a mention in the text on p. 9 that a document has been used to assess the process. I propose that all documents used in the conformity assessment should be listed in the list of used documents.	The table is updated in the report. Most records are however covered by the reference in row 9: “Other documentation and evidence of the standard setting process (records)”.
1.4. a p.9	.....to assess the compliance of the Poish PEFC Scheme	writing error: Polish	Updated in the report.
2. p.12	Based on the results of this conformity assessment, Form international recommends the PEFC Board of Directors to re-endorse the Polish PEFC Scheme, on the condition that the identified non-conformities shall be corrected within 6 months after re-endorsement.	This recommendation classifies all identified non-conformities in one group. All non-conformities shall be corrected within 6 months after the re-endorsement (by the BoD of PEFCC). However, 8 non-conformities were found in the standard setting <b>process</b> : these non-conformities cannot be corrected! I propose that in the “Recommendation” chapter, the consultant classifies the identified non-conformities in several groups and states clearly, which non-conformities shall be corrected and how, and which are non-conformities which have to be accepted in this assessment because of their minor importance.	Updated in the report.



3.1 / 13	There are however 8 non-conformities found in the procedures and 9 in the revision process. .... No non-conformities were found in the Group Certification Procedures, .....	It should be mentioned that the 8 non-conformities in “procedures” are the 6 non-conformities in the Forest Management Standard and the 2 non-conformities in the Complaints and Dispute Resolution Process. Otherwise it is irritating as (i) chapter 3.3 on p. 13 states that “Standard Setting Procedures conform with the International PEFC requirements” and (ii) at least the FM standard is maybe not understood as “procedure”.	Updated in the report.
3.4 / 14	The inclusion of subrequirements which function (and use) is unclear And the issue of a small proportion of forest	What is meant with these two statements? Even if this is only a summary it should be explained in more detail.	Updated in the report.
4.1. p.16	..private owned lands ...average size of the private forest	..or privately owned lands ? ...or average size of a private forest holding ?	Updated in the report.
4.1. p.16	Since the endorsement of the Polish PEFC Scheme in 2008, 80 % of the country’s forest area has been PEFC certified (7.3 million hectares). All these Polish forests are either certified as a group or as a region	It would be valuable to know, if certification covers substantial areas of privately owned forests! - This fact could have easily been led to a situation to identify some private forest owners to participate the process.	According to the “Scheme Description – The Polish PEFC Scheme” chapter 7.1, only the State Forests National Holding has a PEFC certificate for sustainable forest management. None of the private forests is certified.
5.1 / 19	However, two observation are made related to PEFC 1001:2012: ....	What is the time-line to undertake corrective action? Suggestion is to also list the observations in the summary in the beginning to avoid that they “get lost”.	It shall be noted that observations are issues / weaknesses found in the Polish PEFC Scheme that need the attention of PEFC Polska, but do not result in a non-conformity in relation to PEFC International’s requirements. Observations are therefore not linked to specific requirements and no corrective actions



			or timelines are provided. Because they are of less importance, they are not included in the summary. Explanation added to the report.
5. p.19	There are 9 non-conformities found, all related to the process and classified as minor.	In para 5 there are 9 non-conformities listed, out of which 8 are related to the process: the second non-compliance listed (Invitation letter, dd8th of February2012) has not been marked as “Process”.	This was an omissions, updated in the report. All nine non-conformities relate to the process.
5.1. p.19	PEFC N 06.	What does this acronym mean? Not listed in the list of acronyms	This was a typo, should be PEFC PL 1001:2012. Updated in the report.
5.1 / 19	However, two observation are made related to PEFC N 06:	Should read: However, two observations are made related to PEFC N 06:	Updated in the report.
5.1 / 20	Next, three observation are made: .....	The observations listed give the impression that the documentation is sloppy – is it still transparent enough to handle it as an “observation” (rather than a “minor non-conformity”)?  Reference to requirements is missing.	It shall be noted that observations are issues / weaknesses found in the Polish PEFC Scheme that need the attention of PEFC Polska, but do not result in a non-conformity in relation to PEFC International’s requirements. Observations are therefore not linked to specific requirements.
5.2 / 20	Below, the non-conformities are presented, followed by a selection of conformities that to the opinion of the assessment team are critical issues and/or illustrative examples of the Standard Setting Procedures and Process. See also other chapters, such as 6.2	The presentation of the non-conformities is clear, but what is meant with conformities in relation to critical issues / illustrative examples? Are the observations presented in more detail?	The text in the report is updated. It does not concern the observations (although these might accidentally be included), but a selection of conformities that to the opinion of the assessment team are sensitive issues for the Polish context and/or illustrative examples of the respective standard.



	and 7.2.		
5.1 / 20	Next, three observation are made: .....	Should read: Next, three observations are made: .....	Updated in the report.
5.2.1 pp.20-27	list of minor non-conformities	It would be valuable from the critical reader’s point of view to state something about the acceptable amount of minor non-conformities in the standard setting process. The list is long and gives easily the impression that PEFC Polska has not done proper enough work when carrying out the process. At least a short summary to analyze the significance and magnitude of these non-conformities as total is needed. – There are some comments on page 20 (5.1) , but the consultant should consider to give more space for this.	A summary is given in chapter 5.1, explaining the poor record keeping in the sense that records were often very concise and therefore in cases did not contain the information needed to show conformity with the standard-setting procedures. Additional explanation is added to chapter 3.3 (summary on the standard setting process).
p.21	PEFC Polska explained that they sought the participation of private forest owners’ associations (including web-searches for addresses, phone calls and invitation letters). However, insufficient references in records were found providing the evidence. Without this evidence it is difficult to verify whether these activities were sufficient to seek the private forest owners’ participation.	The non-conformance has been classified as “minor”. However, one million private forest owners in Poland have been left out of the process representing some 16 per cent of the forest area. The consultant should more clearly justify, why this non-conformance is only “minor”. – It seems as if forest certification were only the issue of state-owned forests!	It is indeed a weakness in the process. To the opinion of the assessor, PEFC Polska could have done more (or should have provided more evidence of their efforts) to get the private forest owners involved. However, it is considered a minor for the following two reasons: <ul style="list-style-type: none"> <li>As explained by PEFC Polska, the average size of privately owned forests is very small (1.2 ha) and there seems to be no interest amongst private forest owners for certification, nor with the associations representing these private forest owners;</li> </ul>

			<ul style="list-style-type: none"> <li>PEFC Polska at least invited several associations to participate in the process, but without any response.</li> </ul>
5.2.2 pp.27-32	List of selected conformities	In chapter 5.2. the consultant explains the structure of the two following chapters. However, in chapter 5.2.2 no statements on the conformity are represented, like in chapter 5.2.1 (conforms – does not conform)	This was an omission. Updated in the report.
5.2.2 / 33	Minutes of the third meeting of WG2:	Should read: Minutes of the third meeting of WG2:	Updated in the report.
5.2.2 / 33 and 34	Requirement 5.8: Minutes of the third meeting of WG 2: “Then there was voting on the documents developed by the working group. Documents: Group Forest Certification - requirements and Certification and Accreditation Procedures were adopted unanimously. In the case of the Standard setting process - requirements, due to its importance, Internet voting was used. The vote was attended by 12 people - 11 votes in favor and one against.” And Process; Minutes of the third meeting of WG 2 (14/15 of June, 2012): “Then there was voting on the	Why does the first citation mention one opposition (last sentence) and the second citation does not (although cited from the same minutes)?  Does this conform the requirement?  A detailed explanation is given in the Annex I, p. 88-90 (criterion 5.9 a-c) – why not here?	Only those sentences of the minutes are quoted that provide the evidence of conformity of the specific requirement. For the first requirement the last sentence had to be quoted to provide the evidence for the consensus, whereas for the second requirement the first sentence is sufficient to provide evidence for the type of meeting to reach consensus. It shall be noted that criterion 5.9 a-c are additional requirements related to specific mechanisms to resolve negative voting, for which more citation and explanation is needed.



	documents developed by the working group. Documents: Group Forest Certification - requirements and Certification and Accreditation Procedures were adopted unanimously.”		
6.1 / 35	Para 1 and 2	The reader gets the impression that the standard in general is rather vague and unclear / difficult to follow. Or does it only refer to the non-conformities and observations? If latter is the case I suggest to mention it (e.g.: “these findings results in 6 non-conformities and 6 observations”) otherwise the reader questions why the FM Standard “is in general quite complete” and conforms (apart from non-conformities).	When leaving out the subrequirements, the standard is quite complete and criteria are clear, clearly structured, and most of the criteria are in conformity with the requirements. The additional subrequirements however add to some confusion, which is classified as a minor. Additional explanation is added to the report.
6.1 / 35	Bullet 1: The standard does not explicitly require record-keeping to provide evidence of compliance with the requirements of the forest management standard. ....	Should this be classified as observation or rather “minor non-conformity”?  What is the time-line to undertake corrective action? Suggestion is to also list the observations in the summary in the beginning to avoid that they “get lost”.	Although the Polish PEFC Scheme does not explicitly require record keeping, most of the criteria and/or subrequirements do refer to specific records. The assessor concluded that in practice the standard meets this requirement. To avoid any confusion or disputes, it would however be preferred to include such a requirement, and therefore it is included as an observation.  It shall be noted that observations are issues / weaknesses found in the Polish PEFC Scheme that need the attention of PEFC Polska, but do not result in a non-conformity in relation to



			PEFC International's requirements. No corrective action requests and timelines are therefore formulated.
6.1. p.35	<p>Most criteria are further elaborated in subrequirements (that could be read as indicators, verifiers and/or guidance). The wording of these subrequirements is often (but not always) presented in question form. They mostly do not provide thresholds and/or prescribe what would be in compliance and what not, and therefore the function (and use) is unclear. Some subrequirements are more elaborated (and prescriptive) than others, and the approach is variable. The standard does not notify if these are indicators and/or verifiers, nor does it provide guidance on how these additional requirements shall be read, interpreted and used: as explanation, examples, or prescribed indicators/verifiers.</p>	<p>The consultant should make a clear proposal, how to deal with these "sub-requirements". - The present content of the Polish standard does not look very professional with these amendments.</p>	<p>To the opinion of the Consultant, the current report should solely assess the conformity of the Scheme without any proposals or advices for improvement.</p>
6.1 / 36	<p>Bullet 2: .... One of the brackets is missing;</p>	<p>What does that mean? A missing bracket generally is a typing error, not an observation.</p> <p>Observations: Reference to requirements is missing.</p>	<p>It shall be noted that observations are issues / weaknesses found in the Polish PEFC Scheme that need the attention of PEFC Polska, but do not result in a non-conformity in relation to PEFC International's requirements. Typing errors are considered observations, as long as they are not resulting in a non-conformity.</p>



6.2.1. pp.36-42	Content of the chapter	Listed non-conformities and presented corrective action requests are well justified	Comment is clear.
6.2.1/37	To the opinion of the assessor, the absence of guidance on these additional requirements does not support the standard as it adds more confusion and risks the misinterpretation of how these requirements shall be used.	I support the assessors. It is not a task for the CB to add requirements. The standard must be clear in order to avoid confusions and misinterpretations.	Comment is clear.
6.2.2. pp.37-50		In chapter 6.2. the consultant explains the structure of the two following chapters. However, in chapter 6.2.2 no statements on the conformity are represented, like in chapter 6.2.1 (conforms – does not conform)	This was an omission. Updated in the report.
6.2.1 / 40	Criterion 4.3.6: PEFC Polska provided several references of legislation, these however referred to protection of soil and water and did not notify nutrient off-take.	Should read: .... referred ...	Updated in the report.
6.2.2. p.48	Observation: the wording of first sentence (“shall be chosen”) excludes the choice for any other species. This contradicts with the second sentence.	Clear proposal needed by the consultant, how to deal with this contradiction	To the opinion of the Consultant, the current report should solely assess the conformity of the Scheme without any proposals or advices for improvement.
6.2.2 / 49	Criterion 5.4.5: Observation: the wording of the first sentence ....	This observation is described in detail – why not the other ones? What are the criteria for selecting the criteria conforming? See also comment 5.2 / 20.	Paragraph 6.3 is meant to present several conformities, and is not primarily meant to present the observations (which are already presented in 6.1). However, for those requirements that are selected to be shown in chapter 6.3, the full assessment result is



			presented, including any additional remarks and/or observations (as in this case). Those conformities are selected that to the opinion of the assessor are sensitive issues for the Polish context and/or illustrative examples of the respective standard.
7.2. pp.51-53	content of the chapter	The first para says: ...closed with a statement on the conformity. However, there is only one statement at the end of the chapter.	This was an omission. Updated in the report.
7.1 / 52	Observation, Bullet 1: Clause 4.1.	Reference to requirements is missing.	It shall be noted that observations are issues / weaknesses found in the Polish PEFC Scheme that need the attention of PEFC Polska, but do not result in a non-conformity in relation to PEFC International's requirements. Observations are therefore often not linked to specific requirements.
7.2 / 53	"The group entity is responsible to develop and develop an annual internal ...	Should read: "The group entity is responsible <u>to develop</u> an annual internal ...	Not updated, this is a typo in the original standand text.
7.2 / 54	Last sentence of chapter: Does conform	Why is this stated here explicitly, this is (as far as I found out) the first time in the report.	This was an omission. Updated in the report.
9.1 / 56	If the opinion on the license issuance is negative, the applicant can appeal to the PEFC Polska Council Board.	Should read: ... Council ...	Updated in the report.
10. p.57	the two statements of conformity and corrective action requests	well defined judgements of the consultant	Comment is clear.
11.2. p. 58	ISO/IEC 17021, PN-EN ISO/IEC and other acronyms	Acronyms not listed in the list on acronyms on page 6	Updated in the report.



11.1 / 59	However, the standard contains some inconsequences, as the name refers to both Forest	“inconsequences” ... do you mean “inconsistencies”?	Updated in the report.
11.1 / 59	Bullet 1: Appendix II, Article 4 clause 1: The contract termination clause implicitly provides an opportunity to terminate the contract without any reason.	Why is this an observation? Is this explicitly excluded? Further explanation would be needed.  Reference to requirement is missing.	This observation was made as the clause implications are considered remarkable, but do not result in a non-conformity in relation to PEFC International’s requirements.
12.1 / 61	No non-conformity were found.	Should read: No non-conformity <u>was</u> found.	Updated in the report.
Annex 1 / 62	Table of contents	To avoid misunderstandings “Part V” could be added by mentioning “not applicable” – just to avoid a misunderstanding that a chapter was overseen.	Updated in the report.
Annex Part 1 / 71	Requ. 4.5.: The consideration procedure of an appeal, a complaint ... shall take not more than 1 months.	Should read: 1 month	Not updated, this is a typo in the original standand text.
Annex Part 1 / 74	Requ. 5.1: The stakeholder are considered relevant to the objectives and scope of the standard-setting work.	Should read: The stakeholder <u>s</u> are ....	Updated in the report.
Annex Part 1 / 76	Requ. 5.2: Last para: However, insufficient references in records was found providing the evidence.	Should read: However, insufficient references in records <u>were</u> found providing the evidence.	Updated in the report.
Annex Part II / 124	Requ. 5.4.7: “4.4.7. Genetically-modified trees should not be introduced into the	Why is “should” used in the Polish standard (instead of “shall”)?	This was an omission. The most recent version reads “shall”. Updated in the report.



	environment.”		
Part IV /131//6	PEFC PL 1002:2013, 4.2: “The auditors shall fulfil the general criteria for quality and environmental management systems auditors as defined in PN-EN ISO 19 011 and also given in ISO Guide 65 (PN-EN 45011).”	The reference to ISO Guide 65 is not relevant because in PEFC PL 1002:2013, 4.1 only CBs which fulfil PN-EN ISO/IEC 17021 are accepted for forest management certification.	This is incorrect. According to PEFC PL 1002:2013, 4.1 bullet 2) “The certification body carrying out chain of custody certification against PEFC ST 2002 shall fulfil requirements defined in ISO Guide 65”. It shall be noted that PEFC PL 1002:2013 does include requirements for both chain of custody and forest management certification.
Part IV /134//18	PEFC PL 1002:2013, 7: “Certification bodies carrying out forest management certification shall be accredited by the Polish Accreditation Centre to ensure the credibility of the certification work.”	This exclude other accreditation bodies which are member of the International Accreditation Forum (IAF) or a member of IAF’s special recognition regional groups and implement procedures described in ISO/IEC 17011 and other documents recognised by the above organisations. (See No 20.)	The clause indeed narrows the options provided by PEFC International (which refers to “a national accreditation body”). This requirement does however not specifically require that all members of IAF should be included. It is however remarkable that the Polish Procedure for PEFC Notification of Certification Bodies, Chapter 3 reads: “The certification body (...) shall (...) have a valid accreditation certificate issued by the Polish Centre for Accreditation (...) or by a national accreditation body from another country which is also a member of the IAF”. An observation is added to the report.
Part IV /134//19	PEFC PL 1002:2013, 7: “Each accredited certificate shall have an accreditation number and the name of the relevant accreditation body.”	PEFC GD 1004:2012 requires only that the certificate bear the accreditation symbol of the relevant accreditation body.	Although the wording of the requirements are different, the implication of both requirements is considered similar: they ensure that the certificate is provided by an accredited certification body.



Annex Part IV / 134	Requ. 15: “Summaries of certification reports should be publicly available.”	Is this requirement obligatory? Then it should read “shall”.	This was an omission. The most recent version reads “shall”. Updated in the report.
Part VI / 137//1c	“Article 4: Contract Termination 1. The IBL as well as the PEFC Polska ...	IBL is not defined in Acronymes.	Updated in the report.
Part VI / 139//1f	- if outside Poland, be a legal entity in the country concerned and be registered by an accreditation body, which is a member of the International Accreditation Forum (IAF);”	Add: or a member of IAF’s special recognition regional groups and implement procedures described in ISO/IEC 17011 and other documents recognised by the above organisations.	The addition is to be decided upon by PEFC Polska. It shall be noted that the procedures do also contain requirements regarding ISO/IEC 17021, which are not cited at this specific location, as they are not considered applicable to show conformity of this specific requirement.





