

TJConsulting, Luxembourg

Assessment of the Portuguese forest certification scheme against the requirements of the PEFC Council

Final report

21 February 2015

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Annex 1: Responses to the PEFC International Consultation

Annex 2: TJConsulting stakeholders survey

Annex 3: Responses to the Panel of Experts’ review

Abbreviations

CFFP	Conselho da Fileira Florestal Portuguesa / Portuguese Forestry Sector Council / PEFC Portugal
EA	European co-operation for Accreditation
E-NGO	Environmental Non-governmental Organisation
FSC	Forest Stewardship Council
FMU	Forest management unit
IAF	International Accreditation Forum
ICNF	Instituto da Conservação da Natureza e das Florestas / Institute for nature and forests conservation
ILO	International Labour Organisation
IPAC	Instituto Português de Acreditação / Portuguese Institute for Accreditation
IPQ	Instituto Português da Qualidade / Portuguese Quality Institute
ISO	International Organisation for Standardisation
NSB	National standardisation body
NSCA	National System of Conservation Areas
OR	Operational regulations
RPFP	Regional Plans for Forestry Planning
SFM	Sustainable forest management
SSB	Sectorial standardisation body
TC	Technical Committee
WHO	World Health Organisation
WWF	Worldwide Fund for Nature

1 Background

Conselho da Fileira Florestal Portuguesa/CFFP – PEFC Portugal (here-in-after “the applicant” or “CFFP”) has submitted the Portuguese Forest Certification scheme (PFCS, here-in-after “the scheme”) (see chapter 6) for the re-endorsement by the PEFC Council. Following the PEFC Council’s procedures identified in PEFC GD 1007:2012, the PEFC Council selected TJConsulting to carry out an independent and impartial assessment of the scheme documentation against the PEFC Council requirements.

CFFP was established in 2001 as a non-for-profit organisation to govern the Portuguese forest certification scheme.

CFFP became one of the PEFC Council’s members in 1999 and the scheme was first time endorsed in 2004 and re-endorsed in 2010 with the endorsement validity until 5 November 2015.

2 Objective

The objective of this assessment is to:

- a) Identify conformities and non-conformities of the submitted scheme’s documentation with the PEFC Council requirements;
- b) Provide the PEFC Council Board of Directors with recommendation on the re-endorsement of the submitted scheme’s documentation.

3 Impartiality claim

As the consultant for this assessment, neither TJConsulting nor Mr Jaroslav Tymrak (Principal of TJConsulting) has a vested interest in the development or the management of the scheme; was not involved by consulting or any other means in the revision of the scheme and has not provided any other consultancy services to the applicant.

TJConsulting was committed to undertake its assessment of the scheme based solely on submitted information and factual evidence in a professional and impartial manner.

4 Recommendation

TJConsulting **recommends** the submitted scheme for the PEFC re-endorsement¹.

¹ One minor non-conformity relating to standard setting process (identification of key and disadvantaged stakeholders) should be considered in the next revision of the standard as it is not of such a nature to resolve it immediately by repeating the standard setting process.

5 Executive Summary

Standard setting

Written **standard setting procedures** (OR TC 145) that govern the standard setting/revision process **fully comply** with PEFC ST 1001.

The revision process complies with the PEFC requirements (PEFC ST 1001), **except one minor non-conformity**:

- (1) Key and disadvantaged stakeholders (5.2): The minor non-conformity is based on the fact that the identification of key and disadvantaged stakeholders, their constraints as well as efforts to address those constraints were only made for those stakeholders that expressed their interest in TC 145 work rather than for all stakeholders identified in the stakeholders mapping.

Details about the assessment and the scheme compliance can be found in chapter 8.2 of this report.

Group forest management certification

The Portuguese scheme allows for the regional, group and individual certification. The application of sustainable forest management at those three levels is described in NP 4406, Annex B as an integral part of this document (a forest management standard).

The scheme's requirements for regional and group certification fully comply with the PEFC requirements of PEFC ST 1002.

Details about the assessment and the scheme compliance can be found in chapter 8.3 of this report.

Sustainable forest management standard

The NP 4406 Standard was developed as an official national Portuguese standard that is strictly based on six (6) pan-European criteria and follows the pan-European Operational Level Guidelines. The standard is based on a management system approach that is described in a core part of the document. Criteria and indicators for sustainable forest management are then detailed in Annex A of the Standard.

NP 4406 is sufficiently clear and unambiguous to be used for certification purposes and **sufficiently complies** with the PEFC requirements of PEFC ST 1003.

Details about the assessment and the scheme compliance can be found in chapter 8.4 of this report.

Chain of custody requirements

The scheme documentation provides evidence that **PEFC ST 2002:2013 has been adopted** as a part of the Portuguese scheme.

Details about the assessment and the scheme compliance can be found in chapter 8.5 of this report.

Requirements for chain of custody certification bodies

The scheme documentation provides evidence that **PEFC ST 2003:2012 has been adopted** as a part of the Portuguese scheme.

Details about the assessment and the scheme compliance can be found in chapter 8.6.1 of this report.

Requirements for forest management certification bodies

The requirements for certification bodies, certification procedures and their accreditation are defined in PEFC PT 1002 and PEFC PT 1005.

The scheme documentation (PEFC PT 1002 and 1005) **complies** with the requirements of Annex 6 of the PEFC Council's Technical Document.

Details about the assessment and the scheme compliance can be found in chapter 8.6.2 of this report.

Requirements for dispute settlement in the administration of PEFC scheme

The requirements for CFFP's dispute settlement are defined in PEFC PT 1004. The procedures **comply** with PEFC GD 1004.

Details about the assessment and the scheme compliance can be found in chapter 8.7 of this report.

Further observations relating to the scheme

TJConsulting recommends the applicant to consider, together with ICNF, the following issues that could improve the scheme and its standard revision process²:

(1) Participation of E-NGOs in the revision process

A special attention should be given to participation of E-NGOs. Under representation of this stakeholder category should be recognised and the concept of “key and disadvantaged” stakeholders should actively be used to encourage E-NGOs to actively participate in TC 145.

(2) Communication with stakeholders during the revision process

A special attention should be given active and direct communication (e-mail) with stakeholders, especially those outside the membership in TC 145, especially those that have been identified as “key and disadvantaged”. A result of stakeholder mapping should provide basis for this communication on the start of the revision process, invitation to join TC 145 and invitation to the public consultation. In addition, this communication should be made in sufficient time in advance to allow stakeholders to respond within the defined deadlines. The communication should be properly recorded.

(3) Detail of the forest management standard (general comment)

PEFC ST 1003 should be considered and understood as a meta-standard. Based on this assumption, NP 4406 should be more detailed and specific for national situations than the international document. A significant part of NP4406 is either at the same level of detail as PEFC ST 1003 or does not even reach that detail.

(4) Compliance of operations and their performance level (general comment)

NP 4406 should make it more explicit that forest management operations shall meet the performance level envisaged by the standard and thus make a logical link between the standard’s requirements for forest management planning (Annex A) and performance level of forestry operations.

(5) Compliance of all operators (PEFC ST 1003, 4.1c)

NP 4406 should define, for individual certification purposes, a specific role and responsibility of the FMU manager when commissioning the forest operation to third parties, e.g. contractors.

(6) Enhancement of biodiversity (PEFC ST 1003, 5.4.2, 5.4.10)

The aim of NP 4406 is to “maintain” and “conserve” biological diversity. The conformity with the PEFC requirements was based on implicit interpretation of the standard and assessment of external policy documents that also ensure enhancement/restoration of biological diversity. However, future revision should pay a special attention to enhancement of biodiversity values and should integrate this element into the standard’s approach.

(7) Ecological connectivity (PEFC ST 1003, 5.4.6)

NP 4406 focuses on protection of existing watercourses as a critical element of the ecological connectivity. However, the standard should develop more comprehensively the concept of ecological connectivity, its protection and restoration.

² The observations are those issues that do not cause non-conformity with the PEFC Council requirements according to PEFC GD 1007 definition of conformity/major and minor non-conformity (see also chapter 7.3 of this report) and do not require their resolution according to PEFC GD 1007. However, the observations can provide additional information (to both PEFC Council and the applicant) on the quality and performance of the scheme and areas for its improvement.

6 Referenced documentation

The following documents have been used for the assessment and are referenced in this report:

PEFC Council requirements:

PEFC ST 1001:2010: Standard setting-Requirements

PEFC ST 1002:2010: Group forest management certification – Requirements

PEFC ST 1003:2010: Sustainable forest management – Requirements

PEFC ST 2002:2013: Chain of custody of forest based products – Requirements

PEFC ST 2003:2012: Requirements for certification bodies operating chain of custody certification against the PEFC Council international chain of custody standard

Annex 6 of the PEFC Technical Document: Certification and Accreditation Procedures

PEFC GD 1004:2009: Administration of PEFC scheme

PEFC GD 1007:2012 Endorsement and Mutual Recognition of National Systems and their Revision

PEFC IGD 1007-03:2012 The Assessment Report

Tender dossier Call for proposals for the assessment of the Portuguese forest certification scheme against PEFC Council Requirements (29 July 2014)

Clarification: Assessment report (31 October 2012)

The scheme's documentation

TJConsulting had access to the following documentation submitted or referenced by the applicant:

- documentation submitted by the applicant that was included in the tender dossier of 27 July 2014;
- additional documentation (evidence) relating to the standard setting submitted by the applicant on 1 December 2014;
- Additional documentation (evidence) and revised documentation of the scheme submitted by the applicant on 19 January 2015.

CFFP Normative Documents for PEFC Portugal scheme users:

PEFC PT 1001:2015	Portuguese Forest Certification Scheme – Technical Reference, 2
PEFC PT 1002:2015	General Criteria for the Accreditation of Certification Bodies in PEFC Portugal and Notification
PEFC PT 1003:2014	<i>Withdrawn during the assessment process</i>
PEFC PT 1004:2015	General Procedure for Claims, Disputes and Appeals Resolution
PEFC PT 1005:2015	Requirements for Certification Bodies operating Forest Management Certification against NP 4406
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
PEFC ST 2001:2008	PEFC ST 2001:2008 PEFC Logo Usage Rules – Requirements (second edition 2010-11-26)
CFFP DOC 1001:2009	Statutes of the CFFP

NSB – IPQ Normative documents

NP 4406:2014	Portuguese Standard for the Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management
OR 145	Operational Regulations of the Technical Committee 145

Supporting documentation

CFFP Application letter	Submission of the 2014 Portuguese Forest Certification Scheme (PEFC Portugal)
CFFP DOC 1002:2014	Development Report on the PFCS Revision - Record of Process, 2.
Minutes of TC Plenary Meeting no. 79	
PEFC Minimum Requirements Checklist, Part I - IV	

Additional evidence submitted during the assessment

- [1] ICNF Procedures for mapping stakeholders for TC 145
- [2] Stakeholders list in an Excel database
- [3] Announcement of the TC 145 meeting at the CFFP website (15 November 2013) (<http://www.pefc.pt/noticias-recursos/noticias/265-inicio-dos-trabalhos-da-ct-145>)
- [4] Announcement of the standard revision by SSB – ICNF (<http://www.icnf.pt/portal/icnf/noticias/gloablnews/CT-gestao-florestal>)
- [5] A list of TC 145 members from April 2014 with dates of the membership start (also available at <http://www.icnf.pt/portal/florestas/gf/norm-gf/resource/docs/norm-gf/membr-ct145>)
- [6] E-mail correspondence with TC 145 members – invitation to the meeting of 5 February 2014
- [7] E-mail correspondence with TC 145 members – invitation to the meeting of 14 May 2014
- [8] E-mail correspondence with the sub-committee members – invitation to the meeting of 9 January 2014
- [9] Agenda of the TC 145 meeting – 5 February 2014
- [10] Agenda of the TC 145 meeting – 14 May 2014
- [11] Minutes of TC 145 meeting of 5 February 2014
- [12] Minutes of TC 145 meeting of 14 May 2014
- [13] Minutes of the subcommittee meeting of 9 January 2014
- [14] Announcement of the public consultation at the CFFP website (20 March 2014, <http://www.pefc.pt/noticias-recursos/noticias/295-inquerito-publico-prnp4406-2014>)
- [15] ICNF's E-mail to the TC 145 members regarding the start of the public consultation
- [16] A document with all comments from the public consultation and their consideration
- [17] A screenshot of the INCF website with the announcement of the result of the public consultation (<http://www.icnf.pt/portal/icnf/noticias/gloablnews/np-sist-gest-flor>)
- [18] A screenshot of the INCF website with general information on the development and governance of the standard (<http://www.icnf.pt/portal/florestas/gf/norm-gf/norm#cons>)
- [19] A screenshot of the CFFP website with general information on the development and governance of the standard (<http://www.pefc.pt/certificacao-gfs/elaboracao-np-4406>)
- [20] A screenshot of the CFFP website with summary information on the 2013/2014 revision process (<http://www.pefc.pt/certificacao-gfs/elaboracao-np-4406/noticias>)
- [21] CFFP document explaining the transition period of NP4406:2014 (http://www.pefc.pt/images/planoTransicao_NP4406_2014.pdf)

Additional evidence submitted as response to the draft interim report (19/01/2015)

- [22] Comments to the draft interim report (part 1, 2 and 3)
- [23] An actual list of TC 145 members
- [24] A stakeholder list from the stakeholders mapping (an Excel database)
- [25] ICNF E-mail distribution – start of the revision process (6 November 2013 and 12 December 2013)
- [26] A list of stakeholders' email addresses registered at the CFFP website with automatic news distribution system
- [27] Regulation on nature conservation and biodiversity, Regulation No. 142/2008
- [28] Regulation on Regional Forest Management Plans (PROF), No 364/2013
- [29] Regulation on Natura 2000, No. 140/99
- [30] Regulation on National System of Classified Areas, No. 115A/2008
- [31] Study of the Portuguese Catholic University on perspectives of the forestry sector

7 Methodology and timetable

7.1 Scope of the assessment

The assessment was carried out based on PEFC GD 1007:2012, the tender dossier of 29 July 2014 and the TJConsulting's tender proposal of 26 August 2014.

The assessment was carried out as a desk-top exercise based on the documentation that was provided by the applicant as a part of its application for the PEFC re-endorsement and during the assessment process (see chapter 6).

The assessment also considered comments and documentation submitted as a part of the PEFC's international consultation and TJConsulting's survey amongst Portuguese stakeholders.

7.2 Assessment process

The following table describes the assessment process that is based on and fully conforms to PEFC IGD 1007-03:2012, the tender dossier of 29 July 2014 and the tender proposal of 26 August 2014.

Stage	Description	Output	Time period
Start of the assessment	PEFC Council announced the start of the assessment process on 24 November 2014. Following the contractual documentation, TJConsulting provided the PEFC Council and the applicant with specific assessment deadlines.	The PEFC announcement on the commencement of the assessment	24 November 2014
Stage 1 assessment	The stage 1 assessment was based on the documentation referred to in the tender dossier and other documentation submitted before the start of the assessment. In addition, TJConsulting asked for and received from the applicant additional documentation and evidence (See chapter 6). Stage 1 assessment also included distribution of the stakeholders questionnaire and its analysis	Interim report	24 Nov 2014 – 6 Jan 2015
Comment period	The PEFC Council and the applicant were provided with a draft interim assessment report for their comments and responses.	Applicant's response to the interim report	6 – 20 Jan 2015
Stage 2 assessment	TJConsulting considered all comments, responses and documentation submitted by the applicant.	Final draft report	5 Feb 2015
Public consultation	The PEFC Council has organised a public two months consultation that provided stakeholders with an opportunity to submit comments on the compliance of the scheme with the PEFC Council's requirement.	Comment on the scheme	1 Sep 2014 – 31 Oct 2014

	The comments received were considered during the stage 1 and stage 2 assessment.		
Panel of Experts (PoE) review	The Panel of Experts (PoE) consisting by Prof Hugh Miller, Mr Stefan Czamutjian and Mr Mark Edwards reviewed the draft final report and provided TJConsulting with comments.	PoE comments	2 – 16 Feb 2015
Consideration of the Panel's comments	The comments were incorporated into the final report. Responses to individual comments of the PoE are provided in Annex 3 to this report.	Final report	17 – 21 Feb 2015

7.3 Classification of non-conformities

The assessment provides for three types of decision relating to the scheme conformity with the PEFC Council's requirements as indicated in chapter 7.2.2.4.1.2 of PEFC GD 1007:

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

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

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

8 Assessment

8.1 Assessment of the structure of the scheme

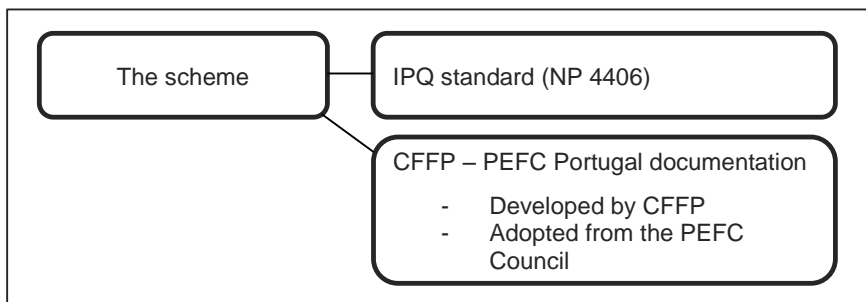
8.1.1 Structure of the scheme's documentation

The PEFC Council does not have any requirements relating to the structure of national forest certification schemes. Therefore, the text and the diagram below illustrates the overall context and some implementation issues relating to the structure and clarity of the scheme's documentation.

The scheme has been developed based on an official Portuguese standard for sustainable forest management (NP 4406) that is owned and governed by the IPQ – Portuguese Quality Institute, an official National Standardisation Body in Portugal.

Additional parts of the scheme consisting of requirements for certification bodies, accreditation, and other administration documents of the scheme have been developed and are governed by the CFFP.

CFFP also adopted as a part of its scheme PEFC Council's international standards for chain of custody (PEFC ST 2002:2013), for chain of custody certification bodies (PEFC ST 2003:2012) and for the PEFC Logo usage (PEFC ST 2001:2008).



IPQ's national standard	
NP 4406:2014	Portuguese Standard for the Sustainable Forest Management Systems - Application of the pan-European criteria for sustainable forest management
CFFP – PEFC Portugal documentation	
PEFC PT 1001:2015	Portuguese Forest Certification Scheme – Technical Reference, 2
PEFC PT 1002:2015	General Criteria for the Accreditation of Certification Bodies in PEFC Portugal and Notification
PEFC PT 1004:2015	General Procedure for Claims, Disputes and Appeals Resolution
PEFC PT 1005:2015	Requirements for Certification Bodies operating Forest Management Certification against NP 4406
CFFP DOC 1001:2009	Statutes of the Conselho da Fileira Florestal Portuguesa
CFFP documentation - adopted from the PEFC Council	
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
PEFC ST 2001:2008	PEFC Logo Usage Rules – Requirements (second edition 2010-11-26)

8.1.2 Organisational arrangement

The scheme aims to be integrated into the “Portuguese Quality System” and integrates the work of various organisations.

CFFP is the governing body of the scheme and represents the scheme in the PEFC Council. It is also responsible for the scheme administration, i.e. notification of certification bodies and issuance of PEFC Logo licenses, and for the scheme’s marketing activities.

IPQ: is a national standardisation body responsible for the development and governance of national Portuguese standards. Within its jurisdiction, it is responsible for the development of the scheme’s forest management standard (NP 4406). For the development and revision of the standard IPQ commissioned ICNF, a sectorial standardisation body (SSB) to co-ordinate the work of the Technical Committee 145 (TC 145). IPQ is a member of ISO (International Standardisation Organisation).

IPAC: is a formal accreditation body in Portugal responsible for accreditation of certification bodies for forest management as well as for chain of custody certification. IPAC is a member of EA (European co-operation for Accreditation) and IAF (International Accreditation Forum).

8.2 Requirements for standard setting

8.2.1 Introduction and summary

Organisation of the standard setting and standard's governance

The Portuguese scheme has chosen to adopt and use a forest management standard that has been developed as an official Portuguese national standard.

The standard is governed and owned by the **Portuguese Quality Institute (IPQ)** that is the National Standardisation Body (NSB) for Portugal. IPQ is responsible for promotion of standardization activities through the creation of Technical Committees. These committees are independent entities co-ordinated by Sectorial Standardization Bodies (SSB) with competence in sectorial standardisation work that is recognised by the IPQ.

IPQ makes a decision on the formal approval of the standard based on a proposal from the SSB and after approval (consensus) of the standard by the Technical Committee.

IPQ has established a permanent sectorial **Technical Committee 145 (TC 145)** that is responsible for developing and revising the NP 4406 standard, by reaching consensus amongst the participating stakeholders. TC 145 is coordinated by the **SSB - Instituto da Conservação da Natureza e das Florestas, ICNF** (<http://www.icnf.pt/portal>) that provides TC 145 with secretarial support and follows the IPQ's and TC's own operational rules.

CFFP/PEFC Portugal supports the standardisation activities with communication tasks and with coordination of stakeholders. FSC Portugal has a similar role in the process.

Standard setting procedures

The standardisation process is governed by a set of **IPQ's procedures** - Procedures and Rules for Portuguese Standardization (Regras e Procedimentos para a Normalização Portuguesa - RPNP). The RPNP is a structured compilation of all documents that regulate the Portuguese standardization activities. It congregates procedures, guidelines, rights and duties that all actors involved in the normative activity in Portugal shall follow.

Based on the RPNP procedures, TC 145 developed its own **TC 145 Operational Regulations** (OR TC 145) that governs its own operation, structure, rights and duties of members, decision making procedures, etc.

OR TC 145 has been assessed against the PEFC requirements outlined in PEFC ST 1001 and the assessment concludes that it is in **full compliance** with the PEFC Council's meta-standard.

In addition to OR TC 145, TC 145 also developed its own procedures for stakeholders mapping and classification of stakeholders.

Composition of TC 145 and balance of stakeholders

TC 145 is the main and principal body in the standardisation process that consists of a broad range of stakeholders relevant to the sustainable forest management. TC 145 is open to all stakeholders interested in the work of the committee and the membership is not limited by a pre-defined maximum number of TC 145 members.

The balanced representation on TC 145 is then ensured through classification of the TC members into three chambers: economic, environmental and social; and by an equal voting power shared amongst the chambers. Each chamber has an equal number of votes and the consensus requires at least 66 per cent of all votes. In addition, any sustained opposition shall be resolved by consensus building procedures outlined in OR TC 145.

TC 145 consists of a large number of stakeholders. Based on the list presented at the ICNF website and provided by the applicant, TC 145 consists of 76 voting members (organisations/individuals); 50 in the economic chamber; 14 in the social chamber and 12 in the environmental chamber.

It should be noted that the list of stakeholders included in CFFP DOC 1002 also includes organisations without voting rights (observers). Altogether (voting members and observers), 32 organisations are representing forest landowners; 25 forest industries; 10 forest administration; 10 research and academic sector; 10 certification and consulting services; and 20 other interests.

It should be noted that the membership in TC 145 had significantly increased during the 2013/2014 revision process as a result of the stakeholder's mapping exercise and an active invitation of stakeholders to join the TC.

However, participation of environmental NGOs in TC 145 is still limited and this particular stakeholder group is under-represented.

Stakeholders mapping

ICNF and TC 145 have carried out a stakeholders mapping exercise based on specific procedures adopted by TC 145. The stakeholders mapping resulted in a list of about 300 organisations and it can be assumed that taking into account size of Portugal and its forestry sector, this total number would represent all or at least a significant part of concerned stakeholders.

It can also be assumed that this systematic approach and the subsequent invitation of all 300 stakeholders resulted in a significant increase in the TC 145 membership.

However, it should be noted that the stakeholders mapping did not include, for example, WWF. As WWF is currently leading and chairing the FSC process in Portugal, it can be assumed that WWF is an important player in sustainable forest management in Portugal and the exclusion of WWF from the stakeholders mapping poses a doubt on whether some organisations haven't intentionally been ignored. The applicant acknowledged this fact and argues that this omission is a mistake rather than intention.

The PEFC Council requires that the stakeholders mapping shall identify key and disadvantaged stakeholders; that it shall identify their constraints and those shall be addressed by the standardisation body. In particular, PEFC ST 1001 requires that the standardisation body shall use direct communication with those stakeholders to ensure that information is "received and understood".

From the submitted documentation and the applicant's clarification, it is understood that the identification of key and disadvantaged stakeholders was not made as a part of the stakeholders mapping but that only those stakeholders who expressed their interest in the TC 145's work were classified as "key and disadvantaged". This approach undermines the principal objective of this exercise – to understand constraints of those stakeholders staying outside the standardisation work and to encourage their participation by addressing those constraints.

Announcement of the revision and invitation of stakeholders

The application documentation states that in October 2013, ICNF informed the 300 stakeholders by a letter/e-mail about the revision process and invited them to join TC 145. The announcement was also published at the ICNF as well as CFFP websites.

It should be noted that the announcement of the revision process and the invitation to join TC 145 was distributed by ICNF 14 days before the TC 145's meeting (November 2013).

This period is considered as quite short in standardisation timelines and does not provide sufficient time for a stakeholder to familiarize themselves with the topic and make decision on participation in the process. On the other hand, it should be noted that any stakeholder is allowed to join TC 145 and the revision process at any stage.

Nevertheless, 70 organisations responded to the announcement and 48 became new members of TC 145 in November 2013 and in February 2014.

Although the announcement also included invitation to comment on the scope and steps of the revision process, no comment relating to the proposed revision process was received (except two comments raised by TC 145 members at the TC 145 meeting (November 2013)).

Open and transparent work of TC 145

During the period between October 2013 and July 2014, TC 2014 met three times and its sub-committee for the forest management standard (NP 4406) met two times.

With the secretarial support of ICNF, TC 145 as well as its sub-committee were organised in very professional way and their members were invited to the meetings in sufficient time in advance by an e-mail with attached documentation and draft standard(s). Minutes of the meetings describe in sufficient detail the debate and conclusions made by TC 145. Based on comprehensive assessment of documentation for a random sample of meetings, it can be concluded that the work of TC 145 was open and transparent and that its members were provided within meaningful and fair opportunities for contribution; allowed them to express their views and comments that have duly been considered by TC 145.

Public consultation

A public consultation was organised between 17 March 2014 and 16 May 2014. The formal announcement was made by the IPQ journal and the consulted draft document was available from the IPQ's consultation website.

The consultation process was also supported by announcements at the ICNF and CFFP websites.

However, direct mailing (mail or e-mail) was not applied to invite and encourage contribution of stakeholders outside TC 145, especially those stakeholders that should be considered as key or disadvantaged (see also discussion on stakeholders mapping and identification of key and disadvantaged stakeholders).

During the public consultation, IPQ/ICNF have received comments from only two organisations. Those comments were subsequently considered by TC 145 and results of their consideration were made public at the ICNF website.

Approval of a draft standard by TC 145 (consensus)

At its meeting held on 5 February 2014, TC 145 voted on a preliminary draft standard (NP 4406) with no negative vote. On 14 May 2014, TC 145 voted on a final draft of the standard that was submitted to the IPQ for a formal approval – homologation. All members (26) participating in the meeting voted in favour of the standard and thus TC 145 reached consensus.

Formal approval – homologation of the standard

Based on the consensus reached by TC 145, the standard was formally approved by the IPQ on 14 July 2014 and published shortly in the IPQ's journal in July 2014.

The front page of the standard implies that the standard is applicable from 14 July 2014 and its transition period ends on 14 July 2015.

Compliance of the standard setting process with the PEFC ST 1001

The detailed assessment in 8.2.2 concludes that the standard setting (revision) process complied with PEFC ST 1001, except one minor non-conformity:

5.2: Key and disadvantaged stakeholders

The minor non-conformity is based on the fact that the identification of key and disadvantaged stakeholders, their constraints as well as efforts to address those constraints were only made for those stakeholders that expressed their interest in TC 145 work rather than for all stakeholders identified in the stakeholders mapping.

Observations relating to the standard setting (revision) process

TJConsulting recommends the applicant to consider, together with ICNF, the following issues that could improve the future revision process.

Participation of E-NGOs

A special attention should be given to participation of E-NGO. Under representation of this stakeholder category should be recognised and the concept of “key and disadvantaged” stakeholders should actively be used to encourage E-NGOs to actively participate in TC 145.

Communication with stakeholders

A special attention should be given active and direct communication (e-mail) with stakeholders, especially those outside the membership in TC 145, especially those that have been identified as “key and disadvantaged”. The result of stakeholder mapping should provide a basis for this communication on the start of the revision process, invitation to join TC 145 and invitation to the public consultation. In addition, this communication should be made in sufficient time in advance to allow stakeholders to respond within the defined deadlines. The communication should be properly recorded.

8.2.2 Detailed assessment³

PEFC ST 1001, 4.1		
4.1 The standardising body shall have written procedures for standard-setting activities describing:		
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	<p>OR TC 145, ch. 1 states that Portuguese Quality Institute (IPQ) operates as the National Standardisation Body (NSB) and coordinates the national standardisation activity for the development of a national PEFC forest management standard.</p> <p>OR TC 145, ch. 9 states that the NSB approves, homologates and publishes the standard.</p> <p>OR TC 145, ch. 3 states that Technical Committee (TC) 145 is a body with balanced representation of stakeholders that is responsible to draw up, monitor and revise the Portuguese standard for sustainable forest management.</p> <p>OR TC 145 clearly defines that the IPQ works as the “body responsible for the adoption of the standard” and TC 145 as the “body for consensus building”.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 defines the structure and the role of the standardisation body, for the development and formal approval of the standard.</p>
b) the record-keeping procedures	Procedures	<p>OR TC 145, ch. 4 requires the Sectorial Standardisation Body (SSB) to keep records relating to standard setting process and includes procedures for the records-keeping. The SSB is a body that coordinates the standard setting and supports TC 145 in its work. In the case of the Portuguese forest management standard, the SSB is Instituto da Conservação da Natureza e das Florestas (ICNF).</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 requires the SSB to keep records of standardisation activities.</p>
c) the procedures for balanced representation of stakeholders,	Procedures	<p>OR TC 145, ch. 4a defines procedures for the composition of TC 145, including detailed description of three stakeholder’s chambers (environmental, economic, and social).</p> <p>Compliance: Conformity</p> <p>Justification: OR TC defines balanced representation of stakeholders within TC 145.</p>
d) the standard-setting process,	Procedures	<p>OR TC 145, ch. 7 defines procedures for preparation, approval and revision of the standard.</p>

³ The numbers in brackets [] identify referenced documentation as listed in chapter 6

		<p>Compliance: Conformity</p> <p>Justification: OR TC 145 includes procedures for standard-setting process.</p>
e) the mechanism for reaching consensus, and	Procedures	<p>OR TC 145, ch. 7a defines decision making within TC 145.</p> <p>OR TC 145, ch. 10 defines procedures for resolution of complaints/disputes aiming at reaching consensus.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 defines decision making procedures which aim to reach consensus, including resolution of complaints/disputes relating to the decision making.</p> <p>Note: This conclusion only applies to the presence of procedures for consensus building and not for their content.</p>
f) revision of standards/normative documents.	Procedures	<p>OR TC 145, ch. 12 defines procedure for revision process.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 defines procedures for the revision of standards.</p>

PEFC ST 1001, 4.2	
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	<p>OR TC 145, ch. 1 requires that OR TC 145 shall be periodically revised, including consideration of comments of TC 145 members and other stakeholders.</p> <p>OR TC 145, ch. 1 states that this document shall be publicly available and published at the NSB's website.</p> <p>Compliance: Conformity</p>
Process	<p>OR TC 145 is available from the ICNF website http://www.icnf.pt/portal/florestas/gf/norm#cons.</p> <p>OR TC 145 does not include any reference to a date when it was approved or revised or its terms of validity.</p> <p>CFFP DOC 1002 includes information that OR TC 145 was approved in March 2014 by IPQ.</p> <p>Compliance: Conformity</p> <p>Justification: The standard setting procedures (OR TC 145) are publicly available. The application documentation includes a statement on the revision of the document (OR TC 145) and its formal approval in March 2014. This can be confirmed by the fact that the document includes a number of elements taken from PEFC ST 1001.</p>

PEFC ST 1001, 4.3	
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	<p>OR TC 145, ch. 4 requires that the SSB (ICNF) is responsible for keeping records demonstrating compliance with these procedures [OR TC 145] and the NSB's (IPQ) procedures. The records shall be kept for at least five years and shall be available to interested parties upon request, subject to approval of TC 145.</p> <p>Compliance: Conformity</p>
Process	<p>As a part of the application for the PEFC endorsement and during the course of this assessment, a whole range of documents and records (see chapter 6) relating to the standard setting / revision process have been submitted by CFFP and assessed by the consultant.</p> <p>Compliance: Conformity</p> <p>Justification: The presentation of records as a part of the endorsement application and during this assessment provides sufficient evidence that the relevant records have been kept.</p> <p>TJConsulting has not received any information (either through the PEFC International public consultation or TJConsulting's questionnaire sent to stakeholders) that the standardisation body would reject any request for records to be made available.</p>

PEFC ST 1001, 4.4	
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	
Procedures	<p>OR TC 145, ch. 2 (Terms and definitions) state that TC 145 is recognized by the NSB.</p> <p>OR TC 145, ch. 4a gives then a task to the SSB to ensure on-going balanced representation on TC 145.</p> <p>OR TC 145, ch. 4b then describes procedures for acceptance/rejection of the TC 145 members.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 includes provision for the establishment and work of TC 145 as the committee responsible for the standard setting work.</p>
Process	<p>TC145 is a permanent committee established under the Portuguese Quality System that is responsible for the development and periodic review of NP 4406.</p> <p>On 20 November 2013, TC 145 re-activated a subcommittee responsible for the revision of NP 4406:2013.</p> <p>Compliance: Conformity</p>

PEFC ST 1001, 4.4 a	
4.4 a [The working group/committee shall]: be accessible to materially and directly affected stakeholders,	
Procedures	<p>OR TC 145, ch. 4b states that participation in TC 145 is open to all stakeholders requesting to attend the TC 145's meetings or invited to join TC 145. The request for membership in TC 145 shall be made to the NSB, the Chairman or the Secretary of TC 145.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 ensures that membership in the working group/committee is accessible to all relevant stakeholders.</p>
Process	<p>The ICNF letter to stakeholders presented in Annex 1 of CFFP DOC 1002 includes information about composition of TC 145 that was as that time [October 2013] representing 25 organisations and 2 individuals.</p> <p>The list of TC 145 members presented as Annex 2 of CFFP DOC 1002 includes 96 organisations and individuals that were identified as TC 145 members (2014). However, only 75 are voting members and classified as members of either Economic, Social or Environmental chamber.</p> <p>The submitted Checklist includes information that TC 145 has 74 voting members and 33 participating members (observers).</p> <p>Comments to the draft interim report^[22] clarified the differing numbers of TC 145 members and stated that TC 145 has 76 voting members and 26 observers, in total 102 members. This was supported by an actual list of TC 145 members^[23].</p> <p>ICNF distributed a letter to stakeholders (Annex 1 CFFP DO 1002, "undated") that invites stakeholders to join TC 145. Although the letter is undated, it is expected from the deadline of the "registration form" submission (31 October 2013) that the letter was sent out in Autumn 2013 before the formal start of the revision process. As a result of the invitation to participate in the revision process, the membership of TC 145 grew from 27 voting members to 76 voting members^[22].</p> <p>Compliance: Conformity</p> <p>Justification: Based on received information, it can be concluded that stakeholders have free access to TC 145 and that ICNF has actively invited stakeholders to join TC 145. The significant increase in the TC 145 membership also confirms that stakeholders interested in the standardisation work had open access to TC 145.</p>

PEFC ST 1001, 4.4 b	
4.4 b [The working group/committee shall]: have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process	
Procedures	<p>OR TC 145, ch. 4a describes the composition of TC 145 that consists of three chambers, environmental, economic and social; and describes stakeholder groups that belongs to each of the three chambers.</p> <p>OR TC 145, ch. 7a requires each member of TC 145 to have one vote. Each chamber shall have equal voting power and equal capacity to veto.</p> <p>OR TC 145, ch. 2 defines the term consensus and requires 66 % of votes in each chamber to reach a consensus.</p>

	<p>Compliance: Conformity</p> <p>Justification: OR TC 145 does not define a maximum number of seats in each chamber. However, the balanced representation on TC 145 is guaranteed by the equal voting power of the three chambers.</p>
Process	<p>Comments to the draft interim report^[22] provided information that CT 145 has 76 voting members and 26 observers, in total 102 members. This was supported by an actual list of CT 145 members^[23].</p> <p>49 voting members are classified in the economic chamber; 15 in the social chamber and 12 in environmental chamber^[23].</p> <p>It should be noted that no environmental NGO is represented as a voting member of TC 145. Quercus, an environmental NGO is an observer of TC 145.</p> <p>ICNF carried out stakeholders mapping and identified 21 E-NGOs^[24] relevant to the standardisation work; those organisations were invited to join TC 145. In addition, stakeholders could also obtain information about the revision process from other sources, such as the ICNF website, the CFFP website or a CFFP automatic news distribution mechanism. It is also expected that FSC Portugal which is a voting member of TC 145 distributed information to its members and that CPADA (an umbrella E-NGO representing 110 E-NGOs that is included in the stakeholders mapping list) also distributed the information to its members.</p> <p>Compliance: Conformity</p> <p>Justification: The membership of TC 145 is not balanced. The interest of forest landowners and forest industry (economic interest) dominates dominating the membership. There is a lack of environmental NGOs representation.</p> <p>For the judgement on the balance of representation, the assessment considered not only the stakeholders representation on TC 145 but also decision making procedures of TC 145.</p> <p>TC 145 has no limitations on a maximum number of members to achieve the representation balance. However, the decision making procedures guarantee that each chamber (economic, environmental and social) has an equal number of votes as well as there are additional procedures for reaching the consensus and resolving any sustained opposition.</p> <p>Concerning the lack of E-NGOs representation, it was concluded that no organisation was discriminated from joining TC 145 and that ICNF and CFFP communication was broad enough to reach the environmental organisations.</p> <p>Observation:</p> <p>Although the process satisfies the PEFC requirement, it should be noted that the approach of “key and disadvantaged” stakeholders should be applied in situations where some stakeholder group is under represented. See also assessment of PEFC requirement 5.2.</p>

PEFC ST 1001, 4.4 c	
4.4c [The working group/committee shall]: include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.	
Procedures	<p>OR TC 145, ch. 4a defines composition of three chambers within TC 145. The listed stakeholder groups sufficiently cover those stakeholders that are affected by the forest management standard as well as stakeholders with expertise in forestry matters (forest owners, forest management organisations, public bodies relating to forests, forest services providers, research institutions, and individuals with technical competence).</p> <p>Note 2 to chapter 4a encourages significant representation of interested parties that directly apply the standard.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 ensures sufficient participation of stakeholders affected by the standard and those influencing its implementation.</p>
Process	<p>The list of TC 145 members^[23] includes 102 organisations and individuals that were identified as TC 145 members (2014), out of which 76 are voting members of TC 145.</p> <p>According to the List of members (Annex 2 to CFFP DOC 1002), 31 members represent landowners; 25 industries and contractors; 10 administration; 10 research organisations, 10 certification and consulting services and 20 other stakeholders. The numbers in annex 2 do not fully correspond to the actual list of members^[23].</p> <p>Compliance: Conformity</p> <p>Justification: Forest landowners and industries (those mainly affected by the standard) represent a significant proportion of the TC 145 membership.</p> <p>Strong representation of landowners; administration; research and academic institutions; and certification and consultation services ensures sufficient expertise in the subject matter.</p>

PEFC ST 1001, 4.5	
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	<p>OR TC 145, ch. 10 provides for complaints/dispute resolution procedures for technical as well as procedural/administrative issues.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 includes complaint and dispute settlement procedures.</p>
Process	<p>CFFP claims in its submitted Checklist that no complaint has been received. TJConsulting has not received information that would indicate that a complaint relating to the standard setting process had been submitted.</p> <p>Compliance: Conformity</p> <p>Justification: There is sufficient confidence that no complaint has been received.</p>

PEFC ST 1001, 4.5	
4.5a [Upon receipt of the complaint, the standard-setting body shall]: a) acknowledge receipt of the complaint to the complainant,	
Procedures	<p>OR TC 145, ch. 10 requires that within 10 days of the receipt of the complaint/dispute the Chairman of TC 145 shall notify the claimant of the receipt of the complaint/dispute.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>CFFP claims in its submitted Checklist that no complaint has been received.</p> <p>TJConsulting has not received information that would indicate that a complaint relating to the standard setting process had been submitted.</p> <p>Compliance: Conformity</p> <p>Justification: There is sufficient confidence that no complaint has been received.</p>
4.5b [Upon receipt of the complaint, the standard-setting body shall]: 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.	
Procedures	<p>OR TC 145, ch. 10a states that the complaint is firstly analysed by TC 145 plenary meeting. In a case that cannot be resolved, the TC 145 establishes a complaint/dispute working group (ch. 10b) that shall impartially analyse the complaint and provide TC 145 with recommendation to be ratified by the TC 145 plenary meeting.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 requires impartial investigation and decision making of the complaint.</p>
Process	<p>CFFP claims in its submitted Checklist that no complaint has been received.</p> <p>TJConsulting has not received information that would indicate that a complaint relating to the standard setting process had been submitted.</p> <p>Compliance: Conformity</p> <p>Justification: There is sufficient confidence that no complaint has been received.</p>
4.5 [Upon receipt of the complaint, the standard-setting body shall]: c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	
Procedures	<p>OR TC 145, ch. 10b requires the Chairman of TC 145 to inform the claimant and other involved parties about the result of the complaint/dispute.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>CFFP claims in its submitted Checklist that no complaint has been received.</p> <p>TJConsulting has not received information that would indicate that a complaint relating to the standard setting process had been submitted.</p> <p>Compliance: Conformity</p> <p>Justification: There is sufficient confidence that no complaint has been received.</p>

PEFC ST 1001, 4.6	
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	<p>OR TC 145, ch. 10 requires the SSB to establish at least one specific, easily accessed contact point for sending complaints/disputes concerning the standardisation process, such as a specific e-mail address.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>

PEFC ST 1001, 5.1	
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	
Procedures	<p>OR TC 145, ch. 4a requires that the SSB shall regularly review the composition of TC 145 to achieve balanced representation. The SSB shall ask representatives of PEFC Portugal and FSC Portugal to carry out stakeholders mapping and identify individuals, groups and organisations as well as means of communication with them.</p> <p>OR TC 145, ch. 12 requires that, before the start of a revision process, the SSB shall update a list of stakeholders relevant to the revision process.</p> <p>On 20 November 2013, ICNF approved very detailed and comprehensive procedures for mapping of stakeholders^[1].</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 and the ICNF stakeholders mapping procedures satisfy the requirement.</p>
Process	<p>CFFP submitted a list of stakeholders^[2, 24] with about 300 organisations that are relevant to the subject matter of the TC 145 work.</p> <p>Compliance: Conformity</p> <p>Justification: Taking into account the size of Portugal and its forestry sector, it is expected that the list of the identified 300 organisations would cover all or a significant part of relevant stakeholders.</p> <p>Observation:</p> <p>Due to the fact that the E-NGOs participation in TC 145 is rather limited, the assessment also focused on identification of relevant E-NGOs. It should be noted that 21 E-NGOs have been identified. Some of them, like CPADA (www.cpada.pt) is an umbrella organisation with about 110 members.</p> <p>Concerning the fact that WWF Portugal is not included in the stakeholders list, CFFP provided an explanation^[22] that the stakeholders mapping was done based on two lists provided by CFFP (PEFC Portugal) and FSC Portugal and that the WWF omission was accidental rather than intentional. It should also be noted that WWF Portugal is chairing FSC Portugal and as FSC Portugal is a member of CT 145, WWF Portugal should have access to information about the revision work as well as opportunities for participation in the process.</p>

PEFC ST 1001, 5.2	
5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.	
Procedures	<p>OR TC 145, ch. 4a requires that the process of identification of stakeholders shall also include definition of criteria for determination of “key” and “disadvantaged” stakeholders; identification of those stakeholders; and promotion of their participation and contribution.</p> <p>On 20 November 2013, ICNF has approved very detailed and comprehensive procedures for mapping of stakeholders^[1] that also cover the issue of disadvantaged and key stakeholders and resolving of their constraints.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 requires to identify key and disadvantaged stakeholders. Although OR TC 145 does not explicitly refer to identification of constraints and that “those shall be addressed”, it is assumed that the objective of this requirement will be delivered by “active promotion of their [stakeholders] participation and contribution”.</p> <p>The specific stakeholder mapping procedures then adequately cover the issue.</p>
Process	<p>CFFP submitted a list of stakeholders^[2, 24] with about 300 organisations that are relevant to the subject matter of the TC 145 work. The list does not include which stakeholders are identified as “key and disadvantaged” and does not identify what are their constraints of participation.</p> <p>A list of TC 145 members (Annex 2 to CFFP DOC 1002) includes classification of TC 145 members as “key” and/or “disadvantaged”.</p> <p>Compliance: Minor non-conformity</p> <p>Justification: The minor non-conformity has been assigned based on the fact that the stakeholders’ database does not identify which stakeholders are key and disadvantaged. It is also not evident from the database how possible constraints of the key and disadvantage stakeholders were identified and addressed.</p> <p>It was noted that the members of TC 145 were classified as “key and disadvantaged” and this confirms that the identification of key and disadvantaged stakeholders was only done for those stakeholders that had decided to participate in TC 145.</p> <p>However, the main purpose of the identification of the key and disadvantaged stakeholders is to encourage participation of those “non-participating” stakeholders by active communication and by addressing their constraints (See also PEFC requirements for invitation of stakeholders and for public consultation).</p>

PEFC ST 1001, 5.3	
5.3 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions.	
Procedures	<p>OR TC 145, ch. 8 requires that the SSB is responsible for the announcement of the start of drafting/revision of the standard in co-ordination with the NSB. The SSB shall also ask the Portuguese FSC and PEFC representatives to publish the announcement at their websites.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>CFFP DOC 1002 claims that, in October 2013, an invitation letter (Annex 1 to CFFP DOC 1002) was sent by mail and e-mail to 300 organisations identified in the stakeholders' mapping.</p> <p>CFFP provided copies of ICNF e-mail distribution^[25] to stakeholders (6 November 2013 and 12 December 2013) with the invitation to the revision process (an invitation letter, Annex 1 to CFFP DOC 1002 was attached).</p> <p>ICNF published the invitation at its website in October and November 2013^[4].</p> <p>CFFP published an invitation to TC 145 meeting at its website^[3] (15 November 2013) with a link to the ICNF invitation letter (Annex 1 to CFFP DOC 1002).</p> <p>CFFP also provided information^[26] that the announcement presented at its website^[3] was automatically distributed to a stakeholders e-mails that are registered at the CFFP website.</p> <p>Compliance: Conformity</p> <p>Justification: The announcement was published at the SSB – ICNF and CFFP's website.</p> <p>Observation:</p> <p>It should be noted that the ICNF e-mail distribution was made as a blind copy and that recipients of the e-mail are therefore not directly visible from the e-mails. ICNF provided a list of e-mail addresses of all the e-mail recipients.</p> <p>The invitation letter is undated but it is expected that it was written in October 2013 as the deadline for submission of a registration form mentioned in the letter is 31 October 2013. It should be noted that the e-mail was only sent out on 6 November 2013 (and 12 December 2013) with extended deadlines. As the TC 145 meeting took place on 20 November 2013, the time for stakeholders to respond was very short. On the other hand, ICNF received 70 positive responses for participation in the revision process.</p>

PEFC ST 1001, 5.3	
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	<p>OR TC 145, ch. 8a states that the announcement includes information on the objectives, scope and steps of the standardisation process as well as its timeframe.</p> <p>Compliance: Conformity</p>

	Justification: OR TC 145 satisfies the requirement
Process	<p>The announcement of the revision process is based on a letter to stakeholders (Annex 1 to CFFP DOC 1002) that clearly describes the scope and objective of the revision process (revision of the NP 4406 standard), briefly describes the steps of the revision process and states that the process should be concluded in the first quarter of 2014.</p> <p>The website announcement makes a reference and link to the letter.</p> <p>Compliance: Conformity</p> <p>Justification: The announcement/invitation letter includes the objectives, scope, steps as well as timetable of the process.</p>
5.3 [The announcement and invitation shall include:] b) information about opportunities for stakeholders to participate in the process	
Procedures	<p>OR TC 145, ch. 8a states that the announcement includes information on forms of participation and involvement in the standardisation process.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement</p>
Process	<p>The announcement of the revision process is based on a letter to stakeholders (Annex 1 to CFFP DOC 1002) that clearly describes two principal options of participation in the process (i) as a member of TC 145 or (ii) being informed about the process and having access to the documentation. The letter stipulates the need of stakeholders' participation and encourages stakeholders to actively participate in the process.</p> <p>The website announcements (CFFP and INCF) make a reference and link to the letter.</p> <p>Compliance: Conformity</p> <p>Justification: The announcement/invitation letter includes description of participation opportunities.</p>
5.3 [The announcement and invitation shall include:] 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	<p>OR TC 145, ch. 8a states that the announcement includes an invitation for the appointment of representatives of the stakeholder for TC 145. The invitation to stakeholders should be made so as to ensure that it is received and that it contains all the elements necessary for an informed response.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The announcement of the revision process is based on a letter to stakeholders (Annex 1 to CFFP DOC 1002) that clearly invites stakeholders to join TC 145. The letter also refers to a registration form to be sent back to the ICNF secretariat.</p> <p>CFFP provided copies of ICNF e-mail distribution^[25] to stakeholders (6 November 2013 and 12 December 2013) with the invitation to the revision process (an invitation letter, Annex 1 to CFFP DOC 1002 was attached).</p> <p>The website announcements (CFFP^[3] and INCF^[4]) also made a reference and link to the letter. CFFP also provided information^[26] that the news presented at its</p>

	<p>website³⁾ was automatically distributed to stakeholders' e-mail addresses (500) that are registered at the CFFP's website.</p> <p>Compliance: Conformity</p> <p>Justification: ICNF invited stakeholders to join TC 145. The direct mailing was used for all stakeholders identified through the stakeholders mapping. Also information and invitation published at the CFFP website was directly distributed to stakeholders' e-mail addresses.</p> <p>Observation:</p> <p>It should be noted that the direct mailing (6 November 2013) provided stakeholders with only limited time to respond (TC 145 meeting was on 20 November 2013). On the other hand, ICNF received about 70 positive responses to the invitation.</p>
5.3 [The announcement and invitation shall include:] d) an invitation to comment on the scope and the standard-setting process	
Procedures	<p>OR TC 145, ch. 8a states that the announcement includes an invitation to comment on the scope of the work and on details of the standardisation process.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The announcement of the revision process is based on a letter to stakeholders (Annex 1 to CFFP DOC 1002) that clearly invited stakeholders to comment on the scope and the standard setting process.</p> <p>The website announcements (CFFP and INCF) make a reference and link to the letter.</p> <p>Compliance: Conformity</p> <p>Justification: The process satisfies the requirement.</p>
5.3 [The announcement and invitation shall include:] e) reference to publicly available standard-setting procedures.	
Procedures	<p>OR TC 145, ch. 8a states that the announcement includes information on the public provision of procedures associated with the standardisation process.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The announcement of the revision process is based on a letter to stakeholders (Annex 1 to CFFP DOC 1002) that states that all documents, including procedures of TC 145 are available at the ICNF website.</p> <p>Compliance: Conformity</p> <p>Justification: The announcement/invitation letter makes reference to the TC 145 procedures.</p>

PEFC ST 1001, 5.4	
5.4 The standardising body shall review the standard-setting process based on comments received from the public announcement and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting.	
Procedures	<p>Review of the standard setting process:</p> <p>OR TC 145, ch. 1 requires that [these] procedures shall be revised periodically based on changes in the NSB regulations as well as based on comments from interested parties resulting from dissemination of information on the standardization process. All proposals and changes shall be discussed and approved by TC 145, sent to SSB and validated by the NSB.</p> <p>Appointment of TC 145</p> <p>OR TC 145, ch. 4b requires that the membership in TC 145 is decided at the TC 145 plenary meeting and its result shall be sent to the SSB. The membership of stakeholders within the categories defined in chapter 4a is accepted automatically. For all other stakeholders, TC 145 must assess their relevance to the work of the committee. If an application is rejected, the stakeholder must be informed in writing of the reasons for their non-acceptance.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>Review of the standard setting process</p> <p>The application documentation does not include information on whether ICNF had received any comment relating to the suggested revision process (as a result of the announcement of the revision process) and whether those comments were considered.</p> <p>CFFP provided information^[22] that no comment relating to the standard setting process was received. The minutes of the TC 145 meeting of 20 November 2013 do not include any reference to comments submitted by stakeholders and records consideration of two comments made by TC 145 members.</p> <p>Review of the TC 145 participation</p> <p>TC 145 considered at its meeting held on 20 November 2013 stakeholders' responses to the announcement/invitation to the revision process. CFFP DOC 1002 claims that "consequently 48 new members expressed interest in following standardization work and 34 new stakeholders joined the TC".</p> <p>Minutes of the TC 145 meeting of 20 November 2013 state that in total 70 responses had been received. 26 stakeholders were not interested in joining TC 145 but wanted to receive information. 44 organisations were interested in joining TC 145. However some of the applications were incomplete and would be considered at the next plenary meeting.</p> <p>It was explained by the applicant that 33 new members were accepted at the meeting of 20 November 2013 and 16 new members at the following meetings in 2014^[20]. This is confirmed by a list of TC 145 members from April 2014 indicates start of the membership and shows members that have joined in November 2013 as well as in February 2014.</p> <p>Compliance: Conformity</p>

	<p>Justification: There is sufficient confidence that no comment on the revision process was received.</p> <p>TC 145 accepted all stakeholders interested in participation in TC 145.</p>
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PEFC ST 1001, 5.5	
5.5 The work of the working group/committee shall be organised in an open and transparent manner where: a) working drafts shall be available to all members of the working group/committee,	
Procedures	<p>OR TC 145, ch. 6b defines tasks of the TC 145 Secretary, including logistic support to TC 145 and delivery of documentation necessary for the TC 145's operation.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>TC 145 met three times on 20 November 2013 (No 76), 5 February 2014 (No 79) and on 14 May 2014.</p> <p>A subcommittee for the revision of the forest management standard met on 11 December 2013 and on 9 January 2014.</p> <p>TJConsulting has chosen to review the process and documentation relating to the TC 145 meeting of 5 February 2014 and 14 May 2014 and the subcommittee meeting of 9 January 2014:</p> <p>ICNF distributed, by an e-mail^[6, 7, 8], an invitation to the meetings to all members of TC 145 and the sub-committee. The email correspondence also included attachments with an invitation letter and an agenda^[9, 10]; draft standard(s); and other relevant documentation.</p> <p>Compliance: Conformity</p> <p>Justification: Based on the review of the ICNF's records for randomly selected meetings, there is sufficient confidence that the members of TC 145 and the sub-committee were invited to the meetings sufficiently in advance and were provided with the draft documentation, in sufficient time prior the meetings.</p>
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	
Procedures	<p>OR TC 145, ch. 6 requires that TC 145 provides equal opportunities for members to contribute for the drafting or revision of standardisation documents and submit their comments on the aforementioned documents.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>TJConsulting has chosen to review the process and documentation relating to the TC 145 meetings of 5 February 2014 and 14 May 2014 and the subcommittee meeting of 9 January 2014:</p> <p>Minutes to the meetings ^[11, 12, 13] confirm that the members participating at the meeting had an opportunity to present their comments and views.</p> <p>Compliance: Conformity</p> <p>Justification: Based on the review of the ICNF's records for randomly selected meetings, there is sufficient confidence that the members of TC 145 and the sub-</p>

	committee were provided with meaningful opportunities for contributing to the revision work and for presenting their views and comments.
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.	
Procedures	<p>OR TC 145, ch. 6 requires that TC 145 considers all the comments and opinions of members, openly and transparently, in compliance with the procedures described in these Regulations.</p> <p>OR TC 145, ch. 6b requires that the Secretary of TC 145 is responsible for keeping records of the TC 145's meetings, including comments and opinion of its members, points of controversy, consensus reached, etc.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement</p>
Process	<p>TJConsulting has chosen to review the process and documentation relating to the TC 145 meetings of 5 February 2014 and 14 May 2014 and the subcommittee's meeting of 9 January 2014:</p> <p>Minutes to the meetings ^[11, 12, 13] confirm that members' views and comments were considered by TC 145 and by the sub-committee in an open and transparent way. The work of TC 145 and the sub-committee was recorded in sufficient detail in the meetings minutes and those were distributed to the TC 145 members and the sub-committee members.</p> <p>Compliance: Conformity</p> <p>Justification: Based on the review of the ICNF's records for randomly selected meetings, there is sufficient confidence that TC 145 and the sub-committee considered comments and views of its members and their work was recorded in the minutes.</p>

PEFC ST 1001, 5.6	
5.6a [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the start and the end of the public consultation is announced in a timely manner in suitable media	
Procedures	<p>OR TC 145, ch. 8b requires a public enquiry. The announcement of the public enquiry shall include the start and the end of the public consultation and shall be published at the SSB website or other interested organisations' websites. Chapter 8 requires that the SSB shall ask the Portuguese FSC and PEFC representatives to publish the announcement on the public enquiry at their website and disseminate it.</p> <p>Compliance: Conformity</p>
Process	<p>The public consultation was officially announced by the IPQ in its official journal of March 2014 (Annex 3 to CFFP DOC 1002). The public consultation lasted from 18 March 2014 until 17 May 2014.</p> <p>The public consultation was also announced at the ICNF website in March 2014 (Annex 5 of CFFP DOC 1002) and at the CFFP website^[14] on 20 March 2014.</p> <p>ICNF distributed the information about the public consultation to the TC 145 members by an e-mail^[15] of 17 March 2014.</p> <p>Compliance: Conformity</p>

	<p>Justification: IPQ, ICNF and CFFP announced the public consultation in the beginning of the consultation period.</p>
<p>5.6b [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable</p>	
Procedures	<p>OR TC 145, 4a requires that the SSB shall specify proactive ways of involving disadvantaged stakeholders.</p> <p>OR TC 145, 8b requires that “the SSB must also send the invitation to the stakeholders previously identified in the course of the mapping, so as to ensure that it is accepted and that it contains all the details necessary for informed participation”.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The public consultation was officially announced by the IPQ in its official journal of March 2014 (Annex 3 to CFFP DOC 1002). The public consultation lasted from 18 March 2014 until 17 May 2014.</p> <p>The public consultation was also announced at the ICNF website in March 2014 (Annex 5 of CFFP DOC 1002) and at the CFFP website^[14] on 20 March 2014. The CFFP’s news was automatically distributed to e-mail addresses that are registered at the CFFP’s website (500)^[26].</p> <p>ICNF has distributed the information about the public consultation to the TC 145 members by an e-mail^[15] of 17 March 2014.</p> <p>Compliance: Conformity</p> <p>Justification: The public consultation was announced through the website announcements and by e-mail distribution the CT 145 members.</p> <p>The key and disadvantaged stakeholders were only identified within TC 145 (see also PEFC requirement 5.3) and there is no evidence that the ICNF direct mailing would reach stakeholders outside TC 145. However, the conformity has been assigned based on the fact that the CFFP’s automatic distribution of website announcements reached about 500 active e-mail addresses. It should also be noted that the composition of TC 145 is exceptionally broad (102 members) and that all those stakeholders were covered by the ICNF’s direct mailing.</p> <p>Observation:</p> <p>It should be noted that the results of stakeholders mapping should not only be used for the purposes of stakeholders invitation to join TC 145 but should also be used for active communication with all relevant stakeholders during the revision process, including the public consultation.</p>
<p>5.6c [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the enquiry draft is publicly available and accessible</p>	
Procedures	<p>OR TC 145, ch. 8b requires that the enquiry draft standard is published at the SSB’s website or other interested organisations’ websites.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The public consultation was officially announced by IPQ in its official journal (Annex 3 to CFFP DOC 1002) that refers to freely available draft standard.</p>

	<p>The public consultation was also announced at the ICNF website in March 2014 (Annex 5 of CFFP DOC 1002) and at the CFFP website^[14] on 20 March 2014, both referring to the IPQ official consultation/survey website. However, at the time of the assessment this website only includes consultations and documents relating to on-going consultations.</p> <p>Compliance: Conformity</p> <p>Justification: It is expected that the draft standard (NP 4406) was available from the IPQ consultation website. Although currently it only includes on-going consultation and documentation, there is sufficient confidence that the IPQ uses consistent approach and that the draft standard was available at the time of the consultation.</p>
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5.6d [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the public consultation is for at least 60 days	
Procedures	<p>OR TC 145, ch. 8b requires that the public enquiry lasts at least 60 days.</p> <p>Compliance: Conformity</p>
Process	<p>The formal announcement made by IPQ in its official journal of March 2014 (Annex 3 to CFFP DOC 1002) referred to the consultation period between 18 March and 17 May 2014.</p> <p>The announcement at the CFFP website^[14] referred to the period between 17 March 2014 and 16 May 2014.</p> <p>Compliance: Conformity</p> <p>Justification: Although there is a small discrepancy in the dates of the public consultation, the period lasted 60 days.</p>
5.6e [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] all comments received are considered by the working group/committee in an objective manner	
Procedures	<p>OR TC 145, ch. 8b requires that the received comments shall be compiled in a predefined form and shall be considered at the plenary meeting of TC 145.</p> <p>Compliance: Conformity</p> <p>Justification: Although OR TC 145 is not explicit on “objective” consideration of comments, it is assumed that general procedures for the work of TC 145 ensures the objectivity.</p>
Process	<p>A limited number of comments from two organisations were received during the public consultation and considered by TC 145 at its meeting on 14 May 2014. Minutes of the meeting^[12] and the file with all the received comments and results of their consideration^[16] provide detailed records on considerations of those comments by TC 145.</p> <p>It should be noted that the TC 145 meeting took place (14 May 2014) two days before the end of the public consultation (16 May 2014). The minutes of the meeting^[12] states that in case that any new comment is received, this would need to be considered by TC 145. CFFP confirmed that no comment was received between 14 and 16 May 2014.</p> <p>Compliance: Conformity</p>

	<p>Justification: The presented evidence provides sufficient confidence that the comments from the public consultation were considered by TC 145 in an objective manner.</p>
<p>5.6f [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.</p>	
Procedures	<p>TC 145, ch. 8b requires that the SSB, with the collaboration of TC 145, must prepare a document including a description of the standardisation process, a compilation of all the comments received, and the results obtained during the evaluation and make this publicly available.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 is not specific on comments received from “public consultation”. However, it is assumed that the wording “comments received” also covers comments from the public consultation.</p>
Process	<p>The ICNF has published at its website^[17] information about the result of the public consultation and made available a document with all received comments and results of their consideration by TC 145^[16].</p> <p>Compliance: Conformity</p> <p>Justification: ICNF has satisfied the PEFC requirement.</p>

PEFC ST 1001, 5.7

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	<p>OR TC 145, ch. 7 requires that the SSB in co-operation with the Portuguese FSC and PEFC representatives shall organise a pilot test. An exemption is provided in a case of revision where an experience from the previous usage of the standard can be applied.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The revision process has not included pilot testing as the experience from the usage of previous versions of the standard sufficiently substituted for the pilot testing.</p> <p>Compliance: Conformity</p> <p>Justification: The revision process satisfies the requirement in respect to the note to PEFC ST 1001, 5.7.</p>

PEFC ST 1001, 5.8

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	<p>OR TC 145, ch. 7 requires that final “homologation” of the preliminary draft is made by the NSB based on the recommendation of the SSB and the approval by consensus at the plenary meeting of TC 145.</p>
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	<p>OR TC 145, ch. 2 defines consensus by reaching 66 per cent of the votes in each chamber of TC 145.</p> <p>OR TC 145, ch. 7 defines procedures for resolution of opposition and negative votes within TC 145.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The minutes of the meeting of 5 February 2014 confirm that the preliminary draft was approved by consensus (28 members present, 24 voted in favour, 4 abstained)</p> <p>The minutes of the TC 145 meeting of 14 May 2014 confirm that the TC 145 members considered comments from the public consultation and unanimously approved changes to the standard (the final draft), (26 members of TC 145 were present at the meeting).</p> <p>Compliance: Conformity</p> <p>Justification: There was no negative vote in the approval of the preliminary draft. A final draft was approved unanimously. CT 145 therefore reached consensus and satisfied the PEFC requirement.</p>

<p>PEFC ST 1001, 5.8</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>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>	
Procedures	<p>OR TC 145, ch. 7a requires that voting occurs within the chambers of TC 145.</p> <p>OR TC 145, ch. 7a states that if necessary, the Chairman may determine the consensus by voting at the plenary meeting of TC 145.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement. It should be noted that the PEFC requirement 5.8 defines alternative ways and it is not mandatory for the standardisation body utilising all of them.</p>
Process	<p>The minutes of the TC 145 meeting of 14 May 2014 confirm that the TC 145 members unanimously approved the standard by YES/NO voting.</p> <p>Compliance: Conformity</p> <p>Justification: The voting procedures comply with the PEFC requirement.</p>

PEFC ST 1001, 5.9	
<p>5.9 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <p>a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,</p> <p>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.</p>	
Procedures	<p>OR TC 145, ch. 7a requires that if there is a negative vote among interest categories within a chamber of TC 145 regarding a basic issue, the dispute shall be resolved using the dispute procedures defined in chapter 10.</p> <p>Following OR TC 145, ch. 10 the dispute is managed by the Chairman of TC 145; firstly it is discussed within TC 145; if not resolved, then discussed between the concerned parties; if not still resolved a dispute working group is established to provide a recommendation to TC 145.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The minutes of the TC 145 meeting of 14 May 2014 confirm that the TC 145 members unanimously approved the standard.</p> <p>Compliance: Conformity</p> <p>Justification: Unanimous approval means that there was no sustained opposition that would need to be resolved.</p>

PEFC ST 1001, 5.10	
<p>5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.</p>	
Procedures	<p>OR TC 145, ch. 8b requires that the SSB, with the collaboration of TC 145, must prepare a document including a description of the standardisation process, a compilation of all the comments received, and the results obtained during the evaluation and make this publicly available.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The ICNF has published at its website general information relating to the development, revision and governance of the forest management standard^[18].</p> <p>Similarly, the CFFP has published at its website similar general information^[19] and a summary of the revision process that outlines main steps and deliverables of the process^[20].</p> <p>Compliance: Conformity</p> <p>Justification: The CFFP published at its website summary of the standard setting process.</p>

	<p>Observation:</p> <p>As the CFFP developed a comprehensive document outlining in detail the main steps of the revision process (CFFP DOC 1002), it would be advisable to make this document publicly available through the CFFP website as the evidence that the revision process followed the TC 145 procedures as well as the PEFC Council's requirements.</p>
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PEFC ST 1001, 5.11	
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	
Procedures	<p>OR TC 145, ch. 7 and 9 require that the standard is "homologated" by the NSB based on recommendation of the SSB and after its approval by consensus by TC 145.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>Based on the decision of TC 145, the ICNF sent the draft standard to the IPQ for a formal approval – homologation. The standard was approved on 14 July 2014 and published in the IPQ's "Official Journal" of July 2014 (Annex 6 of CFFP DOC 1002).</p> <p>Compliance: Conformity</p> <p>Justification: The standard was formally approved by the IPQ.</p>

PEFC ST 1001, 5.12	
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	
Procedures	<p>OR TC 145, ch. 9 requires that the NSB approves, homologates and publishes the standards that become part of the Portuguese collection of standards, through their official publication within the time limits established for this purpose and makes it publicly available.</p> <p>Compliance: Conformity</p> <p>Justification: Although OR TC 145 does not define a maximum time period for the standards publication, it is assumed that the time limits established by the NSB operating as an official authority satisfies the requirement for "publication in timely manner".</p>
Process	<p>The standard was approved on 14 July 2014 and published in the IPQ's "Official Journal" of July 2014 (Annex 6 of CFFP DOC 1002).</p> <p>Compliance: Conformity</p> <p>Justification: The standard was formally published within the same month of its approval – homologation.</p>

PEFC ST 1001, 6.1	
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.	
Procedures	<p>OR TC 145, ch. 12 requires that the standard shall be revised in five years cycles following the methodology defined in these procedures.</p> <p>Compliance: Conformity</p> <p>Justification: OR TC 145 satisfies the requirement.</p>
Process	<p>The previous version of the standard was formally approved in February 2010 and then updated in 2013.</p> <p>Compliance: Conformity (justifiable)</p> <p>Justification: The period between the previous (PEFC endorsed) version of the standard and the assessed version (July 2014) does not exceed 5 years period.</p>

PEFC ST 1001, 6.2	
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	
Process	<p>The front page of the standard (NP 4406) includes the date of the formal approval of the standard (14 July 2014) and the date when the standard enters into forces (14 July 2015).</p> <p>PEFC Portugal has published at its website a document explaining the transition period^[21].</p> <p>Compliance: Conformity</p> <p>Justification: Taking into account transition period document^[21], the approval date in the front page of NP 4406 is understood as the application date (i.e. the date when the document can be applied) and the date of entry into force as the transition date (i.e. the date when the document shall be applied).</p>

PEFC ST 1001, 6.3	
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	<p>The application date is the same as the approval date and does not therefore exceed the one year period.</p> <p>Compliance: Conformity</p> <p>Justification: The application date is the same as the approval date.</p> <p>Observation:</p> <p>The approach taken by the CFFP, respectively by the IPQ does not contradict requirement 6.3 of PEFC ST 1001. However, this also means that the standard can</p>

	be used for certification purposes before it is formally endorsed by the PEFC Council.
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PEFC ST 1001, 6.4	
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.	
Process	The transition date of 14 July 2015 does not exceed the maximum one year period. Compliance: Conformity

8.3 Requirements for group forest management certification

8.3.1 Introduction and summary

The Portuguese scheme allows for the regional, group and individual certification. The application of sustainable forest management at those three levels is described as an integral part of the forest management standard, NP 4406:2014, Annex B. The assessment therefore evaluates separately the regional and the group approach of the Standard.

The Standard uses the term “Forest management unit” to be also applied as the region or the group and the term “FMU manager” as the manager of the region or group. However, Annex B then uses the specific terms of “manager of the regional forest management unit” and “manager of the group management unit”.

The group organisation consists of a group (regional) management organisation represented by a manager of the group (regional) forest management unit. Individual forest owners participating in the group/regional certification are then identified as the “subscribers”. NP 4406, Annex B then defines authorities and responsibilities for both levels, the manager of the group (regional) forest management unit and the subscribers.

The regional and group managers are, according to NP 4406, considered as the FMU managers and it is therefore assumed that the general management system requirements that are defined in the core part of NP 4406 also apply to the regional/group manager (e.g. documented control, management review, etc.)

The requirements for implementation at the regional and group levels described in Annex B are identical and could easily be combined in a single set of requirements.

The scheme’s requirements for regional and group certification fully comply with the PEFC requirements of PEFC ST 1002.

8.3.2 Detailed assessment

PEFC ST 1002, 4.1	
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,	<p>NP 4406, ch. 2.2.24 defines the term “Management organisation” as a group of subscribers represented by the manager of the forest management unit for the purposes of implementation of SFM. The term “Management organisation” is then an equivalent term to the “Regional management organisation” used in Section B.2 of NP 4406 and the “Group management organisation” used in Section B.3 of NP 4406.</p> <p>Conclusion: Conformity</p>
b) the group entity,	<p>NP 4406, ch. 2.2.60 defines the term “manager of the forest management unit” as an entity designated and authorised to represent the subscribers with overall responsibility for ensuring the conformity of forest management in the certified area with the requirements of the SFM standard and other applicable requirements of the scheme.</p> <p>For the purposes of regional certification (Section B.2 of NP4406) the term “manager of the regional forest management unit” is used. In case of group certification (Section B.3 of NP 4406), the term “manager of group forest management unit” is used.</p> <p>Conclusion: Conformity</p>
c) the participant,	<p>NP 4406, ch. 2.2.4 defines the term “subscriber” as public and private entities, owning or managing one or more rural parcels of land, with legal rights upon their own forest properties/plots, covered by conformity forest certificate, which have the ability to implement the requirements of present standard and undertaking a written commitment with of the respective forest management system. The note to 2.2.4 then explicitly excludes on-off contractors from a possibility to become a subscriber.</p> <p>Conclusion: Conformity</p>
d) the certified area,	<p>NP 4406, ch. 2.2.5 defines “certified area” as the forest area covered by the forest certificate representing the sum of forest areas declared by the subscribers which are included in FMU limits.</p> <p>Conclusion: Conformity</p>
e) the group forest certificate, and	<p>NP 4406, ch. 2.2.9 defines the term “conformity forest certificate” as a document confirming that the group organisation complies with the SFM and other applicable requirements of the scheme. The note to this definition clarifies that the term is equivalent to regional, group and individual forest certificate that is used in relevant section of the standard (Section B.2 and B.3 of NP 4406).</p> <p>Conclusion: Conformity</p>
f) the document confirming participation in group forest	<p>NP 4406, ch. 2.2.21 defines the term “document confirming participation in forest certification” as a document issued to a</p>

certification.	subscriber that refers to the “conformity forest certificate” (group, regional) that confirms the participant as being covered by the scope of the forest certification. Conclusion: Conformity
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PEFC ST 1002, 4.1.2	NP 4406
4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification scheme is addressed in any other forest management certification scheme that covers the forest owner.	<p>NP 4406, Annex B requires for the regional manager (B.2.5b) and for the group manager (B.3.5b) to establish procedures for the inclusion of new subscribers that ensure, in the case that the subscribers participate in other forest certification that nonconformities identified under another forest certification are addressed.</p> <p>For this purpose the subscriber in the regional certification (B.2.8c) as well as in the group certification (B.3.8c) are required to declare whether or not they also participate in another certification and shall give a written consent that information on any non-conformity is accessible to all managers of the regional or group certifications in which the subscriber participates.</p> <p>The regional (B.2.7c) and group manager (B3.7.c) are then required to communicate any non-conformity to managers of other regions or groups where the subscriber participates.</p>
<p>Conclusion: Conformity</p> <p>Justification: NP 4406 ensures that where a forest owner participates in more than one forest certifications, any non-conformity is continuously addressed in all the certifications.</p>	

PEFC ST 1002	NP 4406
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>NP 4406, ch 3.4.5 requires the manager of the FMU to undertake a periodic review of the system that takes into account the results of the internal monitoring programme (3.4.5 c).</p> <p>Annex B requires for regional (B.2.7) as well as for group certification (B.3.7) activities carried out by the regional/group manager that represent “central administration of the participant’s conformity”.</p> <p>Annex B requires for regional (B.2.4) as well as group certification (B.3.4) an internal monitoring programme that shall then be reviewed (B.2.7.h for regional certification and B3.2.7.h for group certification).</p>
<p>Conclusion: Conformity</p> <p>Justification: NP 4406 complies with the requirement. It should be noted that as the FMU is defined as the whole region or group and as such requirement 3.4.5 applies to the whole region/group.</p>	

PEFC ST 1002	NP 4406
<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>NP 4406, Annex B defines requirements for internal monitoring programme for the regional (B.2.4) and for the group certification (B.3.4). The internal monitoring programme is focused on forest management plans of the subscribers and on implementation of sustainable forest management practices. The monitoring is based on sampling where the minimum annual sample shall be square root of a number of subscribers. The sample shall be representative concerning the size/structure of the subscribers' property and types of forest stands.</p> <p>B.2.7h and B.3.7h defines responsibility of the regional/group manager for the implementation of the internal monitoring programme and corrective and preventive measures.</p>
<p>Conclusion: Conformity</p> <p>Justification: NP 4406 includes requirements for internal monitoring programme that provides confidence in the conformity of the whole group/region.</p>	

PEFC ST 1002, 4.2.1	NP 4406
<p>4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:</p>	
<p>a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;</p>	<p>NP 4406, Annex B.2.6 for the regional certification and B.3.6 for group certification requires the regional management organization to be responsible for the certification process, including communications and relationships with the certification body; submission of an application for certification; and contractual relationship with the certification body.</p> <p>Conclusion: Conformity</p>
<p>b) To provide a commitment on behalf of the whole group organisation to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>NP 4406, Annex B requires the regional manager (B.2.7k) and the group manager (B.3.7k) to demonstrate the commitment of the management organization to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme.</p> <p>NP 4406, ch 3.1b (forest management requirements) requires a forest policy for the FMU that also includes commitment on compliance with the requirements for SFM, legal compliance, etc.</p> <p>It should be noted that this forest policy requirement also applies to the regional or group manager as the FMU, in case of the regional and group organisation, is considered as the geographical area of the whole region (B.2.1) or the group (B.3.1).</p>

	Conclusion: Conformity
<p>c) To establish written procedures for the management of the group organisation;</p>	<p>NP 4406, chapter 3.3.5 requires the FMU managers to establish a documented control of documents specified in the NP4406 standard and defines further details of this documented control.</p> <p>NP 4406 then considers a region (ch. B.2.1) and a group (ch. B.3.1) as the FMU.</p> <p>NP 4406, Annex B requires the regional manager (B.2.7) and the group manager (B.3.7) to establish procedures for the management of the region/group (control of subscribers; inclusion of new members, exclusion of subscribers and informing the certification body thereof; providing information to subscribers; and internal monitoring programme).</p> <p>Conclusion: Conformity</p> <p>Justification: The regional and group managers are according to NP 4406 considered as FMU managers and it is therefore assumed that the requirement 3.3.5 (documented control) also applies to the regional/group manager and that this documented control also covers procedures outlined in B.2.7 and B.3.7.</p>
<p>d) To keep records of:</p> <ul style="list-style-type: none"> - the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme, - all participants, including their contact details, identification of their forest property and its/their size(s), - the certified area, - the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken; 	<p>NP 4406, chapter 3.4.3 requires the FMU manager to keep records of the forest management systems, including SFM indicators, results of audits, non-conformities, corrective and preventive measures, etc.</p> <p>NP 4406 then considers a region (ch. B.2.1) and a group (ch. B.3.1) as the FMU.</p> <p>NP 4406, Annex B requires the regional manager and the group manager to keep records on subscribers, their forest property and forest area (B.2.7.a, i, B3.7.a, i); their conformity with the certification requirements (B.2.7.i, B.3.7i); conformity with the certification requirements (B.2.5 g, B.3.5 g); and results of an internal monitoring programme, corrective and preventive measures (B.2.7.j and B.3.7.j).</p> <p>Conclusion: Conformity</p> <p>Justification: Chapter 3.4.3 includes general requirements for records keeping relating to the implementation of SFM. As the regional/group manager is considered as the FMU manager, those requirements also apply to the regional/group manager. Annex B then defines specific records keeping requirements for the group/regional managers that sufficiently cover the areas specified by the PEFC requirement.</p>

<p>e) To establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the sustainable forest management standard;</p>	<p>NP 4406, Annex B, states that the subscribers' participation in the regional certification (B.2.1e) and in the group certification (B.3.1 e) is based on a subscriber's written commitment.</p> <p>This commitment provides for written agreement between the group/regional manager and the subscribers; allows the regional/group manager to enforce any corrective or preventive measures and to initiate a subscriber's expulsion from the regional/group certification.</p> <p>The subscriber's participation in the regional/group certification is confirmed by a document confirming participation in forest certification that is issued by the regional/group manager (B.2.7d/B3.7d).</p> <p>Conclusion: Conformity</p> <p>Justification: The written agreement is ensured by the subscriber' written commitment on one hand and by the written confirmation issued by the group/regional manager on the other hand.</p>
<p>f) To provide participants with a document confirming participation in the group forest certification;</p>	<p>NP 4406, Annex B requires that the regional manager (B.2.7d) and the group manager (B.3.7d) make available to the subscribers a document confirming participation in forest certification.</p> <p>NP 4406, ch 2.2.21 establishes the definition for "document confirming participation in forest certification"</p> <p>Conclusion: Conformity</p>
<p>g) To provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>NP 4406, Annex B requires the regional manager (B.2.7l) and the group manager (B.3.7l) to provide all subscribers with information and guidance required for the effective implementation of the SFM standard and other applicable requirements of the forest certification scheme.</p> <p>Annex B requires the regional manager (B.2.7e) and the group manager (B.3.7.e) to establish a procedure to inform the subscribers about their rights, duties and sanctions that are associated to the participation in the group/regional certification.</p> <p>Conclusion: Conformity</p>
<p>h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;</p>	<p>NP 4406, Annex B requires the regional manager (B.2.7h) and the group manager (B.3.7h) to establish an internal monitoring programme.</p> <p>Annex B then establishes procedures for such a monitoring programme in the regional certification (B.2.4) and in the group certification (B.3.4) based on a sampling methodology.</p> <p>Conclusion: Conformity</p>

<p>i) To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.</p>	<p>NP 4406, ch 3.4.5 requires the manager of the FMU to undertake a periodic review of the system, at pre-established time intervals, that it is adequate and effective. The management review shall take into account (among others): c) the results of the internal monitoring programme; d) the results of the internal audits and those conducted by the certification body; e) the corrective and preventive measures; f) the evaluation of the effectiveness of the corrective actions taken.</p> <p>NP 4406 then considers a region (ch. B.2.1) and a group (ch. B.3.1) as the FMU.</p> <p>Conclusion: Conformity</p> <p>Justification: The regional and group managers are, according to NP 4406, considered as the FMU managers and it is therefore assumed that the requirement 3.4.5 also applies to the regional/group manager.</p>
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PEFC ST 1002	NP 4406
4.3.1 The forest certification scheme shall define the following requirements for the participants:	
<p>a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>NP 4406, Annex B requires the subscribers in the regional certification (B.2.8) and in the group certification (B.3.8a) to participate in the regional/group certification based on a written commitment.</p> <p>Conclusion: Conformity</p>
<p>b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>Annex B requires the subscribers in the regional certification (B.2.8a) and in the group certification B.3.8a) to comply with the SFM standard and other applicable requirements of the scheme.</p> <p>Conclusion: Conformity</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>Annex B requires the subscribers in the regional certification (B.2.8e) and in the group certification (B.3.8e) to provide the regional/group manager and the certification body with full co-operation; to allow access to their forests and facilities; and to make available data, information, and documentation.</p> <p>Conclusion: Conformity</p>
<p>d) To implement relevant corrective and preventive actions established by the group entity.</p>	<p>Annex B requires the subscribers in the regional certification (B.2.8g) and in the group certification B.3.8g) to implement relevant corrective and preventive actions.</p> <p>Conclusion: Conformity</p>

8.4 Requirements for forest management standard

8.4.1 Introduction and summary

Scope and content of the standard

The requirements for sustainable forest management are defined in NP 4406:2014. The document is designed as an application of the Pan European Criteria and Indicators for Sustainable Forest Management and the Pan European Operational Level Guidelines in the Portuguese conditions. NP 4406 follows the structure of six (6) pan European criteria for sustainable forest management that are further described by indicators that are based on the Pan European Operational Level Guidelines.

NP 4406 uses the management system approach that is based on ISO 14001 and ISO 9001. The management system requirements described in the core part of the document (chapter 3) follow the quality's continuous improvement cycle (PLAN – DO – CHECK – ACT) and allow a certain level of compatibility with the international standards for management systems.

Annex A includes Criteria and Indicators for sustainable forest management that are logically structured into:

- a) Requirements for forest management planning, including justifications of the requirement where necessary;
- b) Sources of information at the regional level;
- c) Sources of information at group/individual level
- d) Guidelines for forest plantations

Annex B defines specifications for the application of the standard at the regional, group and individual levels.

It is concluded that NP 4406 is logically structured and the standard's concept is used consistently throughout the document.

Assessed version of the standard

As a part of the formal application, the applicant submitted an edition of the document that was formally adopted by the IPQ on 18 February 2014. However, it should be noted that the revision process was completed in July 2014 and that the edition of the standard to which the IPQ refers at its website is from 14 July 2014.

As a response to the draft interim report, the applicant stated that this was a result of a mistake that was made during the translation phase and the applicant submitted a new version of the standard that was formally adopted by the IPQ on 14 July 2014 and published on 17 July 2014. This version also includes small changes and corrections that were, as a part of the assessment, verified with the original Portuguese version.

Performance requirements of the standard

Primarily, the standard is based on the management system concept. However, PEFC ST 1003 requires that the forest management standard shall include both the management system as well as performance based requirements. It should be noted that there can be a certain doubt on whether the standard includes sufficient "performance" level.

First of all, the Introduction chapter of NP 4406 explicitly states that the "*standard does not include absolute requirements for forestry performance beyond the commitment, established*

in the forest policy, to comply with the Portuguese legislation, to comply with applicable regulations as well as other requirements subscribed to by the manager of the forest management unit and to fulfil the pan-European criteria for sustainable forest management". This clause does not make reference to Annex A with requirements for sustainable forest management planning that have been used to evaluate the Standard's compliance (performance) with the PEFC requirements.

Secondly, Annex B includes, with a few exemptions, requirements for forest management planning and there can be a reasonable level of doubt as to whether the requirements for the forest management planning would also be fully reflected by applied forest management practices.

However, the assessment is based on the following assumptions leading to the conclusion that the forest manager's compliance with the standard also ensures certain performance level for applied forest management practices:

- a) Annex A is an integral part of the Standard that includes mandatory requirements, it is assumed that the forest manager shall comply with Annex A;
- b) Policy for the FMU requires fulfilment of the "standard requirements" (chapter 3.1), it is assumed that this also covers Annex A;
- c) The fulfilment of pan-European criteria is verified by their indicators defined in Annex A (chapter 3.2.2);
- d) The manager shall implement the forest management plan ("*shall define criteria for the execution of the operations foreseen in the forest management plan*", chapter 3.3.6) and it is assumed that that the FMU manager's forest management plan shall comply with Annex A and that the FMU manager is required to implement the plan;
- e) The manager shall evaluate compliance with the forest management plan (chapter 3.4.1);
- f) The manager detects and analyses real and potential nonconformities and implements corrective and/or preventive actions (chapter 3.4.2).

Detail of the Standard's requirements

PEFC ST 1003 has been developed as a meta-standard and it is generally expected and assumed that a national forest management standard would be more detailed and more specific than the international meta-standard.

However, for the vast majority of the PEFC requirements, the NP 4406 standard is either at the same level of detail as PEFC ST 1003 or it does not even reach this detail. A number of PEFC requirements have not been assessed based on explicit wording of the standard but based on implicit interpretation of the standard's requirements; context of Portuguese forestry and legislation currently applicable to forestry operations in Portugal.

Nevertheless, it should be noted that taking into account the observations above, the requirements of the standard are still sufficiently unambiguous to be auditable and to be used for certification purposes.

Requirements for forest plantations

Annex A to NP 4406, includes a section for the relevant indicators that describes interpretation of the indicator for the management of forest plantations. The approach of the “plantation’s interpretation” is based on a mosaic of intensively managed plantations stands and set-aside (conservation) areas that are focused on satisfying environmental and ecological functions of forest resources.

This approach and the wording of the “plantation’s interpretations” in the Standard is in full compliance with Appendix 1 to PEFC ST 1003.

Compliance with PEFC ST 1003

The NP 4406 Standard sufficiently complies with the requirements of PEFC ST 1003.

Observations to NP 4406

The following issues should be considered in the next revision of NP 4406:

- a) General: PEFC ST 1003 should be considered and understood as a meta-standard. NP 4406 should be more detailed and specific for the national situation than the international document.
- b) Compliance of operations and their performance level: NP 4406 should make it explicit that forest management operations shall meet the performance level envisaged by the standard and thus make a logical link between the standard’s requirements for forest management planning (Annex A) and performance level of forestry operations.
- c) Compliance of all operators (4.1c): NP 4406 should define, for individual certification purposes, a specific role and responsibility of the FMU manager when commissioning the forest operation to third parties, e.g. contractors.
- d) Enhancement of biodiversity (5.4.2, 5.4.10): the aim of the Standard is to “maintain” and “conserve” biological diversity. The conformity with the PEFC requirements was based on implicit interpretation of the standard and assessment of external policy documents that ensure enhancement/restoration of biological diversity. However, future revision should pay a special attention to enhancement of biodiversity values and integrate this element into the standard’s approach.
- e) Ecological connectivity (5.4.6): The Standard focuses on protection of existing watercourses as a critical element of the ecological connectivity. However, the standard should develop more comprehensively the concept of ecological connectivity, its protection and restoration.

8.4.2 Detailed assessment

PEFC ST 1003, 4.1a	NP 4406
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>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.</p>	<p>NP 4406, chapter Objectives states that the requirements of the Standard are applicable at the FMU.</p> <p>The standard (Introduction) states that it does not include “absolute” requirements beyond legislation, forest policy and the pan-European criteria.</p> <p>The requirements of Annex A are mainly focused on management planning. However, Annex A is an integral part of the Standard that includes mandatory requirements;</p> <p>Policy for the FMU requires fulfilment of the “standard’s requirements” (chapter 3.1);</p> <p>The fulfilment of pan-European criteria is verified by their indicators defined in Annex A (chapter 3.2.2);</p> <p>The manager shall implement the forest management plan (“<i>define criteria for the execution of the operations foreseen in the forest management plan</i>”, chapter 3.3.6);</p> <p>The manager shall evaluate compliance with the forest management plan (chapter 3.4.1);</p> <p>The manager detects and analyses real and potential nonconformities and implements corrective and/or preventive actions (chapter 3.4.2).</p>
<p>Conclusion: Conformity</p> <p>Justification: Although the Standard states that it does not have “absolute performance requirements” and Annex A’s requirements are mainly designed for the management planning, it can be assumed that the quoted parts of the standard require forest management practices (performance) to comply with the plan and thus with the requirements of the standard.</p>	

PEFC ST 1003, 4.1b	NP 4406
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>b) be clear, objective-based and auditable.</p>	<p>Requirements of the standard are clear, objective-based and auditable so that they allow an independent and impartial assessment.</p>
<p>Conclusion: Conformity</p> <p>Justification: Although a vast number of the Standard’s requirements do not exceed the level of the detail of PEFC ST 1003, it can be concluded that they are clear and unambiguous enough to allow an independent conformity assessment.</p>	

PEFC ST 1003, 4.1c	NP 4406
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</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>NP 4406, chapter 1 (Scope) states that the requirements of the Standard permit any entity (a manager of the FMU) to define objectives and policy of a SFM system.</p> <p>NP 4406, chapter 3 includes requirements for a management system that apply to the FMU manager.</p> <p>NP 4406 requires for the subscribers in the regional certification (B2.8f) and for the subscribers in the group certification (B.3.8.f) that when forestry operations are performed by third parties (e.g. contractors), the subscriber shall ensure that they are conducted in accordance with the requirements of the forest management system.</p> <p>NP 4406, chapter 3.3.2 requires actions to raise awareness on social, economic and environmental impacts amongst the “FMU intervenients”. The term “FMU intervenient” is then defined under 2.2.40 and also covers forest managers, contractors and employees.</p> <p>NP 4406, chapter 3.2.1 requires collection of information on activities with significant environmental and socio-economic impact, including predicted and performed activities (second bullet point).</p> <p>NP 4406, chapter 3.2.3 requires that the forest management plan shall describe the objectives and goals in compliance with the requirements related with the indicators of Annex A.</p> <p>NP 4406, chapter 3.3.6 requires that the FMU manager shall define criteria for the execution of the operations foreseen in the forest management plan.</p> <p>NP 4406, chapter A.6.3 requires that sufficient information shall be supplied to the different “intervenients”, including contractors.</p> <p>The applicant provided information^[22] that there are currently only two individual forest management certificates, both issued to forest industry companies.</p>
<p>Conclusion: Conformity</p> <p>Justification: The standard includes explicit requirements for regional and group certification that satisfy the PEFC requirement.</p> <p>Concerning the individual certification, the conformity is based on an implicit interpretation of the standard’s requirements that provides sufficient confidence that the FMU manager is also responsible for the third parties (contractors) activities:</p> <ul style="list-style-type: none"> - the standard defines the term “intervenient” and within the term considers contractors at the same level as forest managers and employees, the term is used for the purposes of training and information dissemination, 	

- the standard requires that the forest management planning shall satisfy the standard's requirements (3.2.4) and requires the FMU manager to implement the forest management plan (3.3.6). It is assumed that this implementation shall be carried out in compliance with the plan regardless of whether the activities are performed by contractors or employees. The operations shall be controlled and reviewed by the FMU manager.
- The current implementation of individual certification^[22] is limited to two industrial landowners and it is expected that contractors are under a robust system of supervision there.

Observation:

It should be noted that the conformity for the individual certification was assigned based on the implicit interpretation of the requirements. An explicit requirement for the responsibilities of the FMU manager and the third parties performing the forestry operations would avoid any doubts on the interpretation of the standard.

PEFC ST 1003, 4.1d	NP 4406
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.</p>	<p>NP4406, chapter 3.4.3 (Records keeping) requires the manager of the FMU to keep records of the forest management system and defines a scope of records to be kept, including indicators of the sustainable forest management (Section A of the Standard).</p>
<p>Conclusion: Conformity</p> <p>Justification: NP 4406 includes requirements for the records keeping. The scope of the records to be kept covers the compliance with the SFM requirements of the Standard.</p>	

PEFC ST 1003, 5.1.1	NP 4406
<p>5.1.1 Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of the economic, ecological, cultural and social values of forest resources, including soil and water. This shall be done by making full use of related services and tools that support land-use planning and nature conservation.</p>	<p>NP 4406, A1.1 requires an appropriate use of forest area in conformity with its principal function and refers to enhancement of economic, ecological, cultural and social values of forest resources.</p> <p>NP 4406, chapter 3.2.4 requires that the forest management plan promotes continuous improvement of the SFM and makes reference to the sectorial planning.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard makes reference to the enhancement of the economic, ecological cultural and social values and to soil and water protection functions of forest resources. The standard makes reference to the sectorial planning and it is expected that the sectorial planning is represented by the RPPF.</p> <p>Although the Standard does not make a specific reference to the maintenance and increase in the forest area, the compliance can be deduced from other requirements of the Standard relating to the forest conversion, conversion of abandoned agricultural land as well as from mandatory references to the sectorial planning and compliance with legislation (including legislation applicable to the regional planning).</p>	

PEFC ST 1003, 5.1.2	NP 4406
<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>NP 4406, chapter 3.2.4 requires that the forest management plan shall promote continuous improvement; shall consider results of environmental and socio-economic impact assessment; and shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation and shall be kept up-to-date.</p> <p>NP 4406, 3.2.1 requires the manager to carry out an environmental and socio-economic impact assessment.</p>
<p>Conclusion: Conformity Justification: NP 4406 satisfies the requirement.</p>	

PEFC ST 1003, 5.1.3	NP 4406
<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>NP 4406, chapter 3.2.4 requires that the inventory is a part of the forest management system.</p> <p>NP 4406, A1.1 includes a general requirement relating to the maintenance and enhancement of forest functions and requires availability of information on (a) distribution of soil types and forest functions (production, protection, conservation); (b) forest area by species; (c) non-forested area, (d) area under conversion.</p> <p>NP 4406, A1.1 lists the “national inventory” and other “inventories” as sources of information for this requirement.</p> <p>NP 4406, 3.2.1 includes a requirement for environmental and socio-economic impact assessment and also includes requirements for information on “characterisation of reference situation”.</p> <p>NP 4406, 3.2.2 includes a requirement for collection of information on the FMU’s compliance with the SFM criteria described in Annex A.</p> <p>NP 4406, Annex B includes requirements relating to the manager of a regional and group/individual certification that also cover collection of data on compliance with the SFM requirements (B2.3./B3.3)</p>
<p>Conclusion: Conformity Justification: NP 4406 does not have a comprehensive requirement for forest inventory and mapping. However, the inventory as a mechanism for collection and analysis of information on forest resources can be deduced from other requirements of the Standard:</p> <ul style="list-style-type: none"> - inventory is described as one element of the management system cycle; 	

- “inventories” are referred to as a source of information;
- the FMU manager is obliged to collect information on forest resources as well as on compliance with the SFM criteria.

The Standard does not explicitly refer to “mapping”. However, it can be assumed that the forestry mapping is understood as a mechanism of information/data presentation and as such it is implicitly included covered by the planning, inventory, impact assessment activities described in the standard.

PEFC ST 1003, 5.1.4	NP 4406
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>NP 4406, chapter 3.2.4 defines requirements for the forest management plan. The plan shall address the “FMU’s dimension and complexity”; and shall be based on legislation and on sectorial planning. The plans shall be kept up-to-date.</p> <p>NP 4406, chapter 3.2.3 requires compliance with legislation and it is assumed that this requirement also applies to planning activities.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard requires forest management plans for FMU’s that are appropriate to its size and use; are based on legislation, land-use plans; and are periodically updated.</p>	

PEFC ST 1003, 5.1.5	NP 4406
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>NP 4406, chapter 3.2.4 requires elaboration of forest management plans that describe the “objectives and goals in compliance with the requirements related with the indicators of Annex A as well as to accomplish the normative disposals and reflect the recommendations for action for the FMU...”.</p> <p>NP 4406, chapter 3.2.1 includes requirements for impact assessment that also requires “to collect relevant information to describe the aspects of the activities with significant environmental and socio-economic impact in the FMU, ..., including characterisation of the FMU dimension and complexity, predicted and carried out activities in the FMU, characterisation of the reference situation using the criteria for sustainable forest management (Annex A) for the FMU, or from monitoring outcome...”</p> <p>NP 4406, Annex A includes a number of requirements for forest management planning, including objective and purpose of forest management (A1.1); balance between growth and harvest based on information on standing volume of main forest species (A.1.2); structural and species diversity of forests based on information on species composition of stands</p>

	(A.1.3); forest protection (A.1.4); biological diversity (A.4.1); forest regeneration (A.4.3); soil and water protection (A.5.1); forest infrastructure (A.5.2); etc.
<p>Conclusion: Conformity</p> <p>Justification: The Standard includes requirements for forest management plans (3.2.4) with long-term goals and objectives for the FMUs. The indicators for the SFM defined in Annex A define detailed requirements for the forest management planning that cover all the elements required by the PEFC requirement. It is assumed that the forest management plan is a result of the planning process regulated by Annex 1 and that the plan would always reflect the requirements for the planning.</p> <p>Observation:</p> <p>NP 4406 does not include an explicit requirement for the annual allowable cut and its justification. However, A.1.2 requires that information on “standing volume of main species” and on “standing volume available for harvesting” shall be available. This implies that the management planning shall work with allowable cut although not “annual”.</p>	

PEFC ST 1003, 5.1.6	NP 4406
<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>NP 4406, chapter 3.2.4 requires that the manager of the FMU shall, by request, make available a summary “covering the principal elements about the FMU management”.</p> <p>NP4406, Annex 1 then defines for each indicator whether information is considered as “public” or “private” and as “private” is only defined information relating to harvesting and standing volume (A.1.2); structure and composition of forest stands (A.1.3); carbon storage (A.1.4); forest products’ production (A.3.1); productivity (A.3.2); ownership and user rights (A.6.1); economic profitability (A.6.2). Information relating to all remaining indicators are considered as “public”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard includes a general statement that a principle element of the forest management plan [a summary] is publicly available, except confidential information. The scale of confidential information can be deduced from Annex 1 of the Standard that identifies “public” and “private” information. Information identified in Annex 1 as “private” can be considered as “business and personal information” as they mainly relate to economic activities (e.g. production) of the FMU or can include personal information (e.g. ownership, users’ rights).</p>	

PEFC ST 1003, 5.1.7	NP 4406
<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>NP 4406, chapter 3.4.1 requires monitoring of compliance with the forest management plan.</p> <p>NP 4406, chapter 3.2.1 considers impact assessment as a part of the planning process and requires information on the “reference</p>

	<p>situation” following indicators of Annex 1 or monitoring outcomes.</p> <p>NP 4406, chapter 3.2.2 requires collection of information relating to indicators specified in Annex 1 of the Standard and requires that the monitoring results shall be reflected in the forest management plan’s review.</p> <p>NP 4406, chapter 3.2.4 considers monitoring as an integral part of the forest management system.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard covers monitoring of forest resources and evaluation of management activities as a part of the planning process.</p>	

PEFC ST 1003, 5.1.8	NP 4406
<p>5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.</p>	<p>NP 4406, chapter 3.3.1 requires that the functions, responsibilities and authorities shall be defined, including a representative with a specific responsibility for the compliance with the requirements of the Standard.</p> <p>NP 4406, chapter 3.3.1 also requires to ensure necessary resources (human, technological financial) necessary for operationalization and control of the forest management system.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard complies with the requirement.</p>	

PEFC ST 1003, 5.1.9	NP 4406
<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>NP 4406, chapter A.1.2 requires that the management planning shall guarantee the quantity and quality of the forest resources at medium and long-term, with a balance between harvesting and growth rates.</p> <p>NP 4406, A.2.2 requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long-term.</p> <p>NP 4406, A.1.2 requires that forest management practices shall be conducted in such a way that minimize direct or indirect damages to the forest resources.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard requires that the planning shall ensure balance between harvest and growth and minimisation of negative impacts on the forest resources. It is assumed that the term “forest resources” also covers “forest, soil and water”.</p>	

It should be noted that the requirement explicitly applies to planning activities and not to forest management practices (as required by the PEFC requirement). However, it is assumed, based on the Standard's requirements relating to the implementation of the management plan and its control, that the Standard also requires implementation for the planned activities (see also chapter 8.4.1.1).

PEFC ST 1003, 5.1.10	NP 4406
<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>NP 4406, chapter A1.2 requires that management planning shall maintain or lead to the total volume of the forest resources at an economical, ecological or socially desirable level.</p> <p>Information that shall be available for this indicator includes “standing volume of main forest species” and “volume available for harvesting”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the PEFC requirement based on an assumption that the term “resources” also covers the growing stock (as information on standing volume of main species is required for this requirement).</p>	

PEFC ST 1003, 5.1.11	NP 4406
<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> <ul style="list-style-type: none"> 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. 	<p>NP 4406, chapter 2.2.15 provides the definition of forest conversion that covers conversion of forests to other type of land use and conversion of primary forests to forest plantations.</p> <p>NP 4406, Annex A, A.1.1 includes a text relating to the forest conversion that is identical with PEFC ST 1003, 5.1.11.</p> <p>Guidelines applicable to forest plantations state that forest plantations established by the forest conversion in other than justified circumstances after 31 December 2010 are not eligible for forest certification.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement as it is identical with the PEFC requirement. However, it should be noted that the detail of the requirement, especially the scale of “permitted” conversion, allows for different interpretation. The conformity has been assigned based on</p>	

assumption that the forest conversion is not the critical issue for forestry sector in Portugal and is also regulated and enforced by applicable legislation.

PEFC ST 1003, 5.1.12	NP 4406
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.	NP 4406, chapter A.1.2 states that conversion of abandoned agriculture land shall be taken into consideration whenever it can add economic, ecological, social and/or cultural value.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.2.1	NP 4406
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.	NP 4406, chapter A.2.3 states that the forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the PEFC requirement with an identical wording as the PEFC requirement.</p>	

PEFC ST 1003, 5.2.2	NP 4406
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.	NP 4406, chapter A.2.3 requires monitoring of the health and vitality, including biotic and abiotic factors influencing the health and vitality and provides a list of examples of key factors to be monitored.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement. A list of examples of key factors covers the intended scope of the PEFC requirement.</p>	

PEFC ST 1003, 5.2.3	NP 4406
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.	NP 4406, chapter A.2.3 includes requirements for the maintenance of health and vitality and for monitoring of key factors affecting the health and vitality. It also requires to use natural structures and processes.

	NP 4406 does not explicitly require the manager to consider effects of those factors that occur naturally.
<p>Conclusion: Conformity</p> <p>Justification: Although an explicit requirement for consideration of naturally occurring disturbances is missing in the Standard, the conformity has been assigned based on the following considerations:</p> <ul style="list-style-type: none"> - the Standard requires the monitoring and identification of causes of all relevant biotic and abiotic factors, regardless of whether they occur naturally or are “human” based; - it is assumed that the term “naturally occurring” in the PEFC requirement relates to those disturbances that occur in natural ecosystems not significantly influenced or changed by human activities (that are in those ecosystems natural) and that the purpose of this requirement is to consider those factors that would naturally occur in those undisturbed ecosystems and play an important role in their development. It should be noted that such ecosystems and related disturbances are rather rare in the Portuguese forestry context. 	

PEFC ST 1003, 5.2.4	NP 4406
<p>5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.</p>	<p>NP 4406, chapter 3.2.1 requires environmental and socio-economic impacts of forest management activities and documentation of preventive actions to minimise them. The impact assessment is then considered as an input into the forest management plan development (3.2.4).</p> <p>NP 4406, chapter A.2.1 requires evaluation of fire risks; and requires preventive and protection mechanisms against forest fires.</p> <p>NP 4406, chapter A.2.2 requires an appropriate balance of the nutritional levels in the soil.</p> <p>NP 4406, chapter A.2.3 requires maintenance and increase of health and vitality of forests; refers to usage of natural structures and processes, and preventive biological measures; requires appropriate actions when damages to stands are visible.</p> <p>NP 4406, chapter A.5.1 requires protection of water and soil.</p> <p>NP 4406, chapter A.5.2 requires minimisation of negative impacts of road construction.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement mainly through the comprehensive impact evaluation. Although not explicit, it is also assumed that monitoring of the health and vitality of forests and relating factors required by the standard will result in actions minimising negative impacts of those disturbances.</p>	

PEFC ST 1003, 5.2.5	NP 4406
<p>5.2.5 Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.</p>	<p>NP 4406, chapter A.2.3 requires the best use of natural structures and processes and use of preventive biological measures to maintain and enhance health and vitality of forests. A.2.3 also requires adequate genetic, species and structural diversity.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the PEFC requirements as its text is identical to the PEFC requirement.</p>	

PEFC ST 1003, 5.2.6	NP 4406
<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>	<p>NP 4406, chapter A.2.1 requires that the lightening of fires shall only be applied for the achievement of FMU's management goals and in strict compliance with the relevant legislation.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.2.7	NP 4406
<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>	<p>NP 4406, chapter A.1.2 states that the management planning shall establish measures that ensure that appropriate forest management practices are conducted in such a way that minimise direct and indirect damages to the forest resources.</p> <p>NP 4406, chapter A.4.4 requires that the forest management plan shall aim at the use of suitable regeneration type and forest species ensuring viable regeneration and quality of forest stands.</p> <p>NP 4406, chapter A.4.4 requires that for reforestation and afforestation origins of native species and local provenances that are well adapted to site conditions shall be preferred.</p> <p>NP 4406, chapter A.5.1 requires that special attention is given to FMU's activities with potential impact on soil and water and that necessary guidelines and mitigation measures shall be defined.</p> <p>NP 4406, chapter A.5.1 requires that organic and non-organic waste and litter and oil spill, as</p>

	the result of forest management operations shall be avoided, collected, stored in designated areas and removed in an environmentally responsible manner.
<p>Conclusion: Conformity</p> <p>Justification: The standard includes explicit requirements that satisfy the PEFC requirement concerning (a) the use suitable tree species; (b) minimisation of damages to soil caused by management activities; and (c) spillage of oil and the waste management.</p> <p>Concerning the minimisation of damages caused by tending, harvesting and transport activities to trees, the compliance is based on implicit assumption that the general term “forest resources” (A.1.2) also covers trees.</p>	

PEFC ST 1003, 5.2.8	NP 4406
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	NP 4406, chapter A.2.3 requires that the use of chemical products should be minimised, taking into consideration the appropriate silvicultural and other biological measures.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.2.9	MC&I (Natural Forest)
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.	NP 4406, A.2.3 includes a text prohibiting WHO 1a and 1b pesticides that is identical with PEFC ST 1003, 5.2.9.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.2.10	MC&I (Natural Forest)
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.	NP 4406, A.2.3 includes a text prohibiting certain pesticides that is identical with PEFC ST 1003, 5.2.10.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.2.11	MC&I (Natural Forest)
<p>5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.</p>	<p>NP 4406, ch. 3.3.2 includes a general requirement for the FMU manager to survey the training needs and to ensure training of all staff whose activities have impact on the FMU. It is assumed that those training needs would also cover pesticides usage.</p> <p>NP 4406, ch. 3.3.6 includes a general requirement for the FMU manager to define criteria for execution of operations foreseen in the forest management plan.</p> <p>NP 4406, A.6.3 includes requirements for the usage of competent personnel and their training.</p> <p>NP 4406, A.6.4 includes requirements relating to health and safe working conditions, including education and instructions. This might cover the usage of pesticides to minimize the health and safety risks. However, this would not cover environmental risks of the improper usage of pesticides.</p> <p>NP 4406, ch. 3.2.3 requires the FMU managers to identify and comply with applicable legislation. Law No 173/2005^[2] requires to respect instructions expressed on the pesticides label (Art. 13 (1,2)) [i.e. producers instructions]; compliance with a Code of Conduct (Art. 13 and 20); records-keeping (Art. 13); training and qualification of pesticides' "applicators" (Art. 14); pesticides' storage (Art. 18); and disposal of packaging waste and surplus of pesticides (Art. 19).</p>
<p>Conclusion: Conformity</p> <p>Justification: Although the Standard does not include a specific requirement relating to the proper use of pesticides, the compliance with the PEFC requirement can be deduced from other requirements of the Standard relating to the training, safe and healthy working conditions, and especially through the quoted legislative requirements.</p>	

PEFC ST 1003, 5.2.12	NP 4406
<p>5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.</p>	<p>NP 4406, A.2.2, requires that fertilizers should be applied in a controlled way and minimising their impact.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.3.1	NP 4406
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.	<p>NP 4406, A.1.2 requires maintenance of the quantity of forest resources and balance between growth and harvest.</p> <p>NP 4406, A.2.2 requires that harvesting levels of both wood and non-wood products shall not exceed a rate that can be sustained in the long-term.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.3.2	NP 4406
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	<p>NP 4406, A.3.1 requires that the management planning shall identify and promote the different types of wood and non-wood products. The requirement refers to “Available market studies and new markets” as an information source.</p> <p>NP 4406, A.3.2 requires maximisation of productivity according to the management objectives.</p> <p>NP 4406, A.6.2 requires promotion of economic viability by considering costs and benefits and investments to maintain forest productivity. The requirement refers to information “obtained through the regional economic agents”. The justification chapter refers to the “diversification of the sources of income” to make the income from forest areas more financially attractive.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard broadly covers the requirement for sound economic performance and diversification of forest products.</p> <p>The standard does not make an explicit reference to “consideration” of available market studies and possibilities of new markets. However, the conformity has been assigned based on the following justifications:</p> <ul style="list-style-type: none"> - reference to market studies and new markets is made under information sources of requirement A.3.1 - the justification to A.6.2 explicitly stipulates diversification of income sources to improve financial attractiveness, - the standard refers to information from “regional economic agents”. It could be assumed that those regional economic agents would also deliver available market studies and information on new markets. The applicant provided a study of the Portuguese Catholic University^[31] that stipulates importance of forest products diversification (with focus on non-wood forest products) as an example of such information. 	

PEFC ST 1003, 5.3.3	NP 4406
<p>5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.</p>	<p>NP 4406, A.3.1 requires that the management planning shall take into account the different uses or functions of the managed forest area and makes reference to the use of policy instruments to support production of commercial and non-commercial forest goods and services.</p>
<p>Conclusion: Conformity Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.3.4	NP 4406
<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>NP 4406, A.3.1 requires that the management planning shall identify and promote the different types of wood and non-wood products.</p> <p>A number of requirements of the Standard are focused on maintenance and improvement of forest resources and the forest management system (3.1c; A.1.1; A.1.2; A.1.3; A.1.4; A.2.3, etc.)</p>
<p>Conclusion: Conformity Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.3.5	NP 4406
<p>5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.</p>	<p>NP 4406, chapter A.1.2 states that the management planning shall establish measures that ensure that appropriate forest management practices are conducted in such a way that minimise direct and indirect damages to the forest resources.</p> <p>NP 4406, A.3.2 refers to the maximisation of the forest productivity. The level of forest utilisation shall be adjusted to the site quality.</p> <p>NP 4406, A.4.4 requires regeneration types and tree species used to ensure viable regeneration and good quality of forest stands.</p> <p>NP 4406, A.5.1 requires special attention to be given to activities with potential impact on soil and water and to define necessary mitigation measures and management guidelines.</p> <p>NP 4406, A.2.3 requires to establish proceedings to “unleash appropriate actions when damages in stand are visible”.</p>

Conclusion: Conformity

Justification: The Standard covers the requirement concerning (a) the maintenance of productive capacity; (b) using appropriate regeneration systems and techniques; and (c) avoidance of damages to the soil.

It can implicitly be assumed that the general term “forest resources” (A.1.2) also covers retained stands and trees and that it would require tending and harvesting techniques to avoid damages to retained stands and trees.

PEFC ST 1003, 5.3.6	NP 4406
<p>5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.</p>	<p>NP 4406, A.1.2 requires maintenance of the quantity of forest resources and balance between the growth and harvest.</p> <p>NP 4406, A.2.2 requires that harvesting levels of both wood and non-wood products shall not exceed a rate that can be sustained long-term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.3.7	NP 4406
<p>5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.</p>	<p>NP 4406, A.3.1 requires that management planning shall identify and promote different types of wood and non-wood forest products.</p> <p>NP 4406, A.3.1 requires that where the non-wood forest products are within the responsibility of the manager/owner and are included in the management planning, its exploitation, including fishing and hunting shall be regulated, monitored and controlled.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.3.8	NP 4406
<p>5.3.8 Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.</p>	<p>NP 4406, A.5.2 requires that the manager of the FMU shall plan, establish and maintain an appropriate network of roads and trails, fire-breaks or bridges to ensure an efficient distribution of goods and services in the FMU and improve the protection and accessibility against forest fires.</p> <p>NP 4406, A.5.2 requires that the planning and the construction of this network should be done</p>

	to minimize soil exposure, avoiding watercourses siltation and preserving the natural level and functions of watercourses and riverbeds and minimizing any damages in other conservation areas.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.4.1	MC&I (Natural Forest)
<p>5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.</p>	<p>NP 4406, A.4.1 requires that the management planning shall aim at the maintenance of the biological diversity and its conservation and that the management planning shall define objectives in agreement with the orientation of the policy instruments and the objectives established for biological diversity at a national and/or regional level.</p> <p>NP 4406, A.4.1 requires to identify, protect and/or conserve important forest areas, including protected, sensitive and representative ecosystems, areas with abundance of naturally occurring species, endangered and protected genetic in-situ resources; and large landscape areas.</p> <p>NP 4406, A.4.4 refers to the regeneration with species suitable to site conditions; native species and local provenances.</p> <p>NP 4406, A.4.2 refers to the regulation on the National System of Classified Areas (NSCA) and states that this regulation also provides guidance to the management of the identified values outside the NSCA.</p> <p>NP 4406, definition 2.2.12 on biological conservation also includes “recovery” of natural values.</p> <p>NP 4406 considers continuous improvement as a fundamental element of the management system (Introduction, 3.2.4).</p>

Conclusion: Conformity

Justification: The Standard aims at the maintenance and conservation of biological diversity. Although it does not explicitly refer to ecosystem, species, genetic and landscape levels of biological diversity, this approach can be deduced from other requirements for protection of important forest areas (A.3.1) and for regeneration (A.4.4).

Although the title of criterion 4 includes “enhancement” of forest biodiversity, the following indicators only refer to “maintenance” and “conservation” of biological diversity.

However, the conformity has been assigned based on the following justifications:

- the definition of forest conservation includes the maintenance but also recovery of natural values,

<ul style="list-style-type: none"> - the standard refers to policy instruments for biological diversity (A.4.1) and makes explicit links to Sectorial Plan of Natura 2000, Management Plan of Protected Areas, etc. Those documents also stipulate enhancement of biological values^[27-30], - the Sectorial Plan of Natura 2000 considers biodiversity conservation as “maintenance or recovery of natural values and the recovery and sustainable use of natural resources”^[27], - regulations relating to the environmental protection of National System of Classified Areas (NSCA, Resolution No 115A.2008) governs about 20 % of total forest area of Portugal and this regulation also stipulates enhancement of biodiversity values^[30], - the standard requires that the management system is based on continuous improvement (Introduction, 3.2.4). It can be assumed that the continuous improvement approach would also apply to the management of biological diversity.
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PEFC ST 1003, 5.4.2	NP 4406
<p>5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:</p> <p>a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;</p> <p>b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;</p> <p>c) endangered or protected genetic <i>in situ</i> resources; and taking into account</p> <p>d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.</p>	<p>NP 4406, A.4.1 requires that “forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve important forest areas containing significant concentration of</p> <ul style="list-style-type: none"> - protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes; - abundance of species (naturally occurring), which are globally, regionally and nationally significant; - endangered or protected genetic in situ resources; and taking into account - globally, regionally and nationally significant large areas landscape areas.” <p>NP 4406, A.4.2 requires that “forest management planning shall identify and take into account the species (fauna and flora), protected and/or threatened habitats and endemic species, defined in recognized reference lists”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement. Although “areas containing endemic species and habitats of threatened species” are not included in the list of important forest areas to be protected/conserved (A.4.1), the protection of those species/habitats is covered under A.4.2.</p>	

PEFC ST 1003, 5.4.3	NP 4406
<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>NP 4406, A.4.2 requires that “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>

Conclusion: Conformity

Justification: The Standard satisfies the requirement as it is identical with the PEFC requirement.

PEFC ST 1003, 5.4.4	NP 4406
<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>NP 4406, A.44 requires the use of a regeneration type that is the most suitable to the environment and to the forest species within the management objectives ensuring a viable regeneration and good quality of forest stands.</p> <p>NP 4406, A.4.4 requires the manager to ensure reforestation and afforestation through natural regeneration and when not appropriate, by planting resorting to the most suitable breeding material so to ensure the quantity and quality of the resources.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies with the requirement as it makes preference to the natural regeneration as well as it refers to quality and quantity of forest resources as the aim of the regeneration.</p>	

PEFC ST 1003, 5.4.5	NP 4406
<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>NP 4406, A.4.4 requires that for “for reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate.”</p> <p>NP 4406, A.4.4 requires that “it’s considered 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>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement concerning the origin of species for reforestation and afforestation as it is identical with the PEFC wording.</p> <p>Observation:</p> <p>However, the Standard uses rather ambiguous wording relating to the application of the introduced species. The wording “it’s considered appropriate” is ambiguous, does not introduce a mandatory status of the provision and cannot be considered as consistent with the wording “only...shall be used...” of the PEFC requirement.</p>	

PEFC ST 1003, 5.4.6	NP 4406
<p>5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	<p>NP 4406, A.5.1 requires that the forestry planning should safeguard the protection of existent watercourses, riparian corridors and other existing water systems.</p> <p>NP 4406, A4.1 and 4.2 make reference to policy instruments. A list of such policy instruments is included under information sources for A4.1 and A4.2.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard includes provisions relating to protection of watercourses, riparian corridors and water systems. However, it does not make an explicit reference to “ecological connectivity”.</p> <p>However, the conformity has been assigned based on the following justifications:</p> <ul style="list-style-type: none"> - within the context of fragmented forest ownership^[31] watercourses and riparian areas are the most important elements of the ecological connectivity; - regulation No. 142/2008^[27] that establishes the legal framework for nature conservation and biodiversity defines protected areas that ensure ecological connectivity (Article 5); - regulation on the Regional Forest Management Plans (PROF) ^[28] requires identification of areas that serve as ecological corridors (Article 6). 	

PEFC ST 1003, 5.4.7	NP 4406
<p>5.4.7 Genetically-modified trees shall not be used.</p>	<p>NP 4406, A.4.4 does not allow the use of modified genetic plants.</p> <p>NP 4406, 2.2.50 defines the term genetically modified plant for the purposes of requirement A.4.4 that is based on applicable legislation and is consistent with the definition in PEFC ST 1003.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.4.8	NP 4406
<p>5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.</p>	<p>NP 4406, A.1.3 requires the maintenance or the enhancement of the structural diversity at the FMU level, according to the management objectives, except when it’s necessary to defend the forest against biotic and non-biotic factors.</p> <p>Information to be available for this indicator refers to proportion of pure and mixed, regular and irregular stands; and distribution of stands per species and diameter class and/or age class.</p>

Conclusion: Conformity

Justification: The standard satisfies the requirement although its detail is lower than the PEFC requirement. The conformity statement took into account information that shall be available to measure compliance with the requirement that supplements the intention of the requirement.

Observation: However, it should be noted that the PEFC requirement is focused on structural diversity at the forest stand level, i.e. to promote mixed, vertically and horizontally diverse forest stands, while the Standard is focused on structural diversity at the FMU level.

PEFC ST 1003, 5.4.9	NP 4406
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	NP 4406, A.4.4 requires that “the traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible”.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement as its wording is identical with the PEFC requirement.</p>	

PEFC ST 1003, 5.4.10	NP 4606
5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to improve or maintain biological diversity.	<p>NP 4406, chapter A.1.2 states that the management planning shall establish measures that ensure that appropriate forest management practices are conducted in such a way that minimise direct and indirect damages to the forest resources.</p> <p>NP 4406, A.4.1 requires that the management planning shall aim at the maintenance of the biological diversity and its conservation and that the management planning shall define objectives in agreement with the orientation of the policy instruments and the objectives established for biological diversity at a national and/or regional level.</p> <p>NP 4406, A.4.2 refers to the regulation on the National System of Classified Areas (NSCA) and states that this regulation also provides guidance to the management of the identified values outside the NSCA.</p> <p>NP 4406, A.5.1 requires that special attention shall be given to FMU’s activities with potential impact to water and soil, including necessary guidelines and mitigation measures.</p> <p>NP 4406, definition 2.2.12 on biological conservation also includes “recovery” of natural values.</p>

	NP 4406 considers continuous improvement as a fundamental element of the management system (Introduction, 3.2.4).
<p>Conclusion: Conformity</p> <p>Justification: The Standard explicitly refers to the avoidance of damages to soil and water and to the maintenance of biological diversity. It can be implicitly assumed that the term “forest resources” (A.1.2) would broadly cover the term “ecosystems“ in the PEFC requirement.</p> <p>Although the title of criterion 4 includes “enhancement” of forest biodiversity, the following indicators only refer to the “maintenance” and “conservation” of biological diversity.</p> <p>However, the conformity has been assigned based on the following justifications:</p> <ul style="list-style-type: none"> - the definition of forest conservation includes the maintenance but also recovery of natural values, - the standard refers to policy instruments for biological diversity (A.4.1) and makes explicit links to Sectorial Plan of Natura 2000, Management Plan of Protected Areas, etc. Those documents also stipulate enhancement of biological values^[27-30]. - the Sectorial Plan of Natura 2000 considers biodiversity conservation as “maintenance or recovery of natural values and the recovery and sustainable use of natural resources”^[27], - regulations relating to the environmental protection of National System of Classified Areas (NSCA, Resolution No 115A.2008) governs about 20 % for total forest area of Portugal and this regulation also stipulates enhancement of biodiversity values^[30], - the standard requires that the management system is based on continuous improvement (Introduction, 3.2.4). It can be assumed that the continuous improvement approach would also apply to the management of biological diversity. 	

PEFC ST 1003, 5.4.11	NP 4406
<p>5.4.11 Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.</p>	<p>NP 4406, A.5.2 requires that “the planning and the construction of this network should be done minimizing the soil exposure, avoiding watercourses siltation and preserving the natural level and functions of the watercourses and riverbeds and minimizing any damages to protected and/or threatened species and habitats and endemic species, taking into consideration their migration patterns, existing in the FMU”.</p> <p>NP 4406, A.4.1 requires identification and protection of important forest areas that cover rare, representative ecosystems; and genetic reserves.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p> <p>The Standard does not explicitly require to minimise damages to all types of ecosystems listed in the PEFC requirement. However, it can be assumed that the general requirement on the protection of the important ecosystems (A.4.1) would also cover their protection in case of infrastructure building.</p>	

PEFC ST 1003, 5.4.12	NP 4406
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.	NP 4406, A.2.3 requires that “the manager of the FMU shall monitor the health and vitality of the forest, for example, by ... key factors, such as: pests, diseases, excessive pasture and cattle heads, damages caused by climatic factors or by forest management operations, hunting and tourism and inner waters fishing activities.” NP 4406, A.2.3 then requires that the FMU manager shall establish proceedings to “unleash” appropriate actions, when damages in the stands are visible.
<p>Conclusion: Conformity</p> <p>Justification: Although the Standard does not have a specific requirement relating to balancing the pressure of animal populations and grazing, the compliance with the PEFC requirement can be deduced from a general requirement on the protection of forests against biotic and abiotic factors.</p>	

PEFC ST 1003, 5.4.13	NP 4406
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.	NP 4406, A.4.3 requires that the management planning shall aim at the conservation of long lived and cavernous trees and dead wood. NP 4406, A.4.3 limits the application of the requirement in cases of phytosanitary problems; fire risks; risk for people and its belongings.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.5.1	NP 4406
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.	NP 4406, A.5.1 requires that management planning shall aim at soil and water protection; requires registration and mapping of areas with specific and recognised soil and water protective functions and areas with vulnerable soils.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement. The protective functions provided as an example in the PEFC requirement can be deduced from the Standard’s wording.</p>	

PEFC ST 1003, 5.5.2	NP 4406
5.5.2 Areas that fulfil specific and recognised protective functions for society shall be	NP 4406, A.5.1 requires registration and mapping of areas with specific and recognised

registered and mapped, and forest management plans or their equivalents shall take these areas into account.	soil and water protective functions and areas with vulnerable soils.
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Conclusion: Conformity

Justification: The Standard satisfies the requirement as its wording is nearly identical with the PEFC requirement.

PEFC ST 1003, 5.5.3	NP 4406
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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.

NP 4406, A.5.1 requires that the forestry management planning shall aim at the soil and water protection.

Special attention is to be given to FMU activities with potential impact on soil and water. Management guidelines and mitigation measures shall be defined. In this context, erosion and compaction phenomena, oil spill and waste deposit as a result of forest management operations shall be avoided.

The management planning shall also safeguard the protection of existent water resources namely watercourses, riparian corridors and others existing water systems.

NP 4406, A.2.3 requires to monitor the health and vitality of the forest, including impacts of excessive pasture and cattle heads and in case of visible damage to stands establish appropriate actions.

Conclusion: Conformity

Justification: NP 4406 satisfies the requirement by reducing negative impacts of forestry operations to soil and water; it regulates unsuitable management techniques. Damages of the animal populations are covered by general requirement for forest health and vitality protection.

PEFC ST 1003, 5.5.4	NP 4406
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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.

NP 4406, A.5.1 requires protection of water resources, namely watercourses, riparian corridors; and other existing water systems and all areas relevant to the sustainability of the terrestrial hydrologic cycle and natural hazards such as REN areas or other areas subject to restrictions on public utility.

NP 4406, A.5.1 requires special attention to be given to forestry operations with potential impact on water and soil. Organic and an-organic waste and litter and oil spill, as a result of forest management operations shall be avoided.

NP 4406, A.2.3 refers to the minimum usage of chemical products (pesticides).

Conclusion: Conformity

Justification: The Standard satisfies the requirement. Although the Standard does not explicitly refer to “quality” and “quantity” of water resources, it is assumed that the requirements will have impact on both of the water properties.

Observation: It should be noted that the acronym “REN” is not explained in the standard, is not listed amongst the listed acronyms, is not generally known and cannot be otherwise deduced from the wording of the Standard.

PEFC ST 1003, 5.5.5	NP 4406
<p>5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>	<p>NP 4406, A.5.2 requires that the FMU’s manager shall plan, establish and maintain an appropriate network of roads and trails, firebreaks and bridges.</p> <p>NP 4406, A.5.2 requires that the planning and construction of the infrastructure is done in a manner minimizing the soil exposure, avoiding watercourses siltation and preserving the natural level and functions of the watercourses and river beds.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement concerning the minimisation of infrastructure’s negative impact to water and soil. Although the Standard is not explicit on the proper road drainage facilities, it can be assumed that the drainage facility is a part of the “appropriate network of roads and trails” and that installation and maintenance of road drainage facilities is a mechanism to avoid or minimise “soil exposure and watercourses siltation” to which the Standard refers.</p>	

PEFC ST 1003, 5.6.1	NP 4406
<p>5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.</p>	<p>NP 4406, A.6.2 requires that “forest management planning shall respect the different functions for the society, taking into account the significance of forestry in rural development, and also new opportunities for employment in connection with the socio-economic functions of forests”.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement as it is identical with the PEFC requirement.</p>	

PEFC ST 1003, 5.6.2	NP 4406
<p>5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.</p>	<p>NP 4406, A.6.5 requires that “taking into account the maintenance of other socio-economic functions and conditions forest management shall promote the long-term health and well-being of communities within or adjacent to the forest”.</p>

Conclusion: Conformity

Justification: The Standard satisfies the requirement as it is identical with the PEFC requirement.

PEFC ST 1003, 5.6.3	NP 4406
<p>5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.</p>	<p>NP 4406, A.6.1 requires that “in the certified area, the property rights and the ownership land should be well defined, documented and established. Also the legal rights, consuetudinary, should be recognised and respected”.</p> <p>NP 4406, 3.2.3 requires compliance with legal requirements.</p>
<p>Conclusion: Conformity</p> <p>Justification: The standard satisfies the requirement. It is assumed that the word consuetudinary is used within the same meaning as the term customary. Although the Standard does not refer to the “traditional” rights, it is assumed that such rights do not have significant importance within the Portuguese context.</p>	

PEFC ST 1003, 5.6.4	NP 4406
<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 of 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>NP 4406 does not include requirement relating to the indigenous people.</p>
<p>Conclusion: Conformity</p> <p>Justification: The requirement is not relevant within the Portuguese context as there are no indigenous people in Portugal.</p>	

PEFC ST 1003, 5.6.5	NP 4406
<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</p>	<p>NP 4406, A.6.5 requires that “taking into account the owner’s and other stakeholders’ rights, an adequate access of the public to the forests, shall be permitted, if forest resources and ecosystems are safeguarded”.</p>

resources and ecosystems, as well as compatibility with other functions of the forest.	NP 4406, A.6.5 also requires that the management planning shall take into account recreational function of forests.
<p>Conclusion: Conformity</p> <p>Justification: The standard satisfies the requirement.</p>	

PEFC ST 1003, 5.6.6	NP 4406
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.	NP 4406 requires that forest management plan shall protect areas with special and recognised historical, cultural and spiritual importance.
<p>Conclusion: Conformity</p> <p>Justification: Standard does not refer to areas fundamental to meeting the basic needs of local communities. However, this approach is considered as appropriate as, within the Portuguese context, the fundamental needs of local communities are delivered by governmental policy instruments rather than management of forest resources.</p>	

PEFC ST 1003, 5.6.7	NP 4406
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. However, this shall be done in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land.	NP 4406, A.6.5 requires that forest management plan shall take into account other socio-economic functions, especially the recreational function and aesthetic values of forests.
<p>Conclusion: Conformity</p> <p>Justification: The Standard is consistent with the requirement although it does not refer to the examples referred to in the PEFC requirement.</p>	

PEFC ST 1003, 5.6.8	NP 4406
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>NP 4406, A.3.3.2 requires that the FMU manager shall survey training needs, ensuring that all staff whose activities have an impact on the FMU have received, or receive, an adequate training.</p> <p>NP 4406, A.6.3 requires that “sufficient information and encouragement shall be supplied to the different intervenients of the FMU (forest managers, contractors, forest employees and owners), to implement</p>

	continuous education and training about sustainable forestry.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.6.9	NP 4406
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.	NP 4406, A.6.5 requires that “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>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement as its wording is identical with the PEFC requirement.</p>	

PEFC ST 1003, 5.6.10	NP 4406
5.6.10 Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.	<p>NP 4406, chapter 3.3.3 requires effective communication and consultation with local people and other stakeholders relating to sustainable forest management. It also requires to establish a procedure for receiving, documenting and responding to stakeholders’ questions as well as provide mechanism for resolving complaints and disputes between forest operators and local people.</p> <p>NP 4406, chapter 3.3.3 states that results of monitoring of the indicators of Annex A are of a public nature and are available to stakeholders consultation.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.6.11	NP 4406
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.	NP 4406, A.6.4 requires that “work shall be planned, organised and performed in a way that allows identification of work related dangers”. Work-related risk assessment and all reasonable preventive and protective measures shall be performed. Workers shall be trained about the work-related risks and preventive measures.
<p>Conclusion: Conformity</p>	

Justification: The Standard satisfies the requirement.

PEFC ST 1003, 5.6.12	NP 4406
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.	NP 4406, A.6.4 requires that all reasonable protective and preventive measures relating to the work-related risks shall be applied. Workers shall be trained about the work-related risks and preventive measures.
<p>Conclusion: Conformity</p> <p>Justification: The Standard satisfies the requirement.</p>	

PEFC ST 1003, 5.6.13	NP 4406
5.6.13 Forest management shall comply with fundamental ILO conventions.	<p>NP 4406, A.3.2.3 requires identification, update and compliance with applicable legislation and international treaties and agreements to which the country is signatory, including relevant ILO conventions.</p> <p>All the ILO fundamental conventions have been ratified by Portugal and are in force</p>
<p>Conclusion: Conformity</p> <p>Justification: The compliance with the requirement is ensured through the Standard's provision for compliance with national legislation and international treaties/agreements.</p> <p>ILO fundamental conventions have been ratified (http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102815.) and it is expected that they have been implemented through a national labour-related legislation.</p>	

PEFC ST 1003, 5.6.14	NP 4406
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.	NP 4406, A.6.5 requires contribution or support to research activities and data collection that is needed for sustainable forest management.
<p>Conclusion: Conformity</p> <p>Justification: The standard satisfies the requirement.</p>	

PEFC ST 1003, 5.7.1	NP 4406
<p>5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.</p>	<p>NP 4406 NP 4406, ch. 3.2.3 requires identification, up-date and compliance with the applicable legislation.</p> <p>The manager shall also identify potential conflicts between laws, regulations and international conventions and implement measures to overcome such conflicts.</p>
<p>Conclusion: Conformity</p> <p>Justification: The Standard uses the term “applicable” legislation without further specifications of areas of the applicable legislation as outlined in the PEFC requirement.</p> <p>The compliance has been assigned based on the fact that the Standard requires a systematic approach in identification and update of the applicable legislation that should result in a situation where legislation of all those areas is known and applied.</p>	

PEFC ST 1003, 5.7.2	NP 4406
<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.</p>	<p>NP 4406, 3.2.3 requires that the FMU manager shall establish and maintain procedures for adequate protection of the forest from unauthorised activities such as illegal logging, illegal land use and other illegal activities.</p>
<p>Conclusion: Conformity</p> <p>Justification: The standard satisfies the requirement.</p>	

8.5 Assessment of the chain of custody requirements

CFFP submitted as a part of the application for the scheme re-endorsement the PEFC international chain of custody standard, PEFC ST 2002:2013. Therefore the assessment was only focused on whether CFFP formally adopted PEFC ST 2002:2013 as a part of its scheme.

PEFC PT 1001:2015 includes a statement that CFFP adopted PEFC ST 2002:2013 without any changes or modifications and that all provisions of PEFC ST 2002 apply for the chain of custody certification in Portugal.

CFFP adopted PEFC ST 2002:2013 as a part of its scheme.

8.6 Requirements for certification bodies

8.6.1 Requirements for chain of custody certification bodies

PEFC PT 1002:2015 requires that the certification body operating chain of custody certification shall comply with specific accreditation requirements described in “PEFC ST 2003:2012 *Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody*”.

The scheme complies with the PEFC requirements for chain of custody certification bodies through the mandatory reference to the PEFC Council’s international standard.

8.6.2 Assessment of requirements for forest management certification bodies

8.6.2.1 Introduction and summary

Coverage and scope of requirements

The assessment of requirements for certification bodies operating forest management certification is carried out against Annex 6 of the PEFC Council Technical Document. Those parts of the requirements that refer to the chain of custody certification are not considered.

CFFP has defined the requirements for certification bodies in PEFC PT 1002 (accreditation and notification) and in PEFC PT 1005 (requirements for forest management certification bodies).

It should be noted that CFFP revised its documentation relating to the certification and accreditation requirements during the assessment process. PEFC PT 1001, PEFC PT 1002 and PEFC PT 1005 had been revised and adopted on 16 January 2015. PEFC PT 1003 has been withdrawn.

Certification and accreditation framework

PEFC PT 1002 includes provisions for accreditation and makes reference to the European co-operation for Accreditation (EA) and the International Accreditation Forum (IAF) and states that certification bodies intending to operate forest management certification submit their application to IPAC (the Portuguese national accreditation body) which is a member of IAF and EA.

The Portuguese scheme requires that the certification bodies comply with ISO 17021 and that they are accredited against this document. Also the structure of PEFC PT 1005 which includes additional requirements for certification bodies is based on ISO 17021.

However, it should be noted that although the scheme requires compliance with ISO 17021 (management system certification) it also requires the accreditation bodies to be signatories to IAF's multilateral agreements on product certification (ISO 17065).

Control of the PEFC Logo

PEFC PT 1002 requires the certification body to control the usage of the PEFC Logo where the certified entity is the PEFC Logo user.

PEFC notification of certification bodies

PEFC PT 1002 requires the certification body to apply to the CFFP for notification. The document defines criteria for the notification and refers to an application form and to a notification contract that are included as appendices to PEFC ST 1002.

The scheme's requirements for certification bodies, their accreditation and notification comply with Annex 6 of the PEFC Technical Document.

8.6.2.2 Detailed assessment

Annex 6 of the PEFC TD	PEFC PT 1002, PEFC PT 1001
<p>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?</p>	<p>PEFC PT 1002 requires the forest management certification bodies shall comply with ISO 17021. This ISO standard sufficiently covers the impartiality requirements.</p> <p>PEFC PT 1002, ch. 4 requires that the certification body shall not be involved in the standardisation process as the governing or the decision making body.</p>
<p>Conclusion: Conformity</p> <p>Justification: The scheme satisfies the requirements through references to ISO 17021 and clear definition of the standardisation body.</p>	

Annex 6 of the PEFC TD	PEFC PT 1002
<p>Does the scheme documentation require that certification body for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil requirements defined in ISO 17021 or ISO Guide 65?</p>	<p>PEFC PT 1002, ch. 4 requires that a forest management certification body shall comply with ISO 17021.</p>
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1002 satisfies the requirement.</p>	

Annex 6 of the PEFC TD	PEFC PT 1005
<p>Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?</p>	<p>PEFC PT 1005, ch. 7.1 includes a general requirement that the certification body's personnel shall have competences relating to the environmental, economic and social implications of forest management activities and the certification criteria.</p>
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1005 satisfies the requirement as it is assumed that the certification body's competence is based on its personnel competence.</p>	

Annex 6 of the PEFC TD	PEFC ST 1002
Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management or C-o-C certifications?	PEFC PT 1002 requires that the certification body shall have a good understanding of the PFCS (PEFC Portugal) scheme.
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1002 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 3.2	PEFC PT 1005
Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification?	PEFC PT 1005, chapter 7.2.1 includes qualification requirements for auditors that cover their education, training, auditing experience and technical competencies in forestry (social, environmental and economic aspects).
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1005 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 3.2	PEFC PT 1005
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?	<p>PEFC PT 1005, chapter 7.2.1 requires that auditors shall complete a training in audit techniques based on ISO 19011 [2002].</p> <p>PEFC PT 1005, chapter 7.2.1 makes specific references to chapters 7.1, 7.2, 7.3.1 and 7.3.2 of ISO 19011 [2002].</p> <p>It should be noted that ISO 17021 [2011] incorporated in the document and thus sufficiently covers the general criteria of ISO 19011 [2002].</p>
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1005 satisfies the requirement based on required compliance with ISO 19011 [2002].</p> <p>However, it should be noted that ISO 19011:2002 has been replaced by ISO 19011:2011; it does not exist for application of conformity assessment; it is not available from the ISO website; and cannot be thus applicable. This fact questions the enforceability of the CFFP requirement.</p> <p>However, the general auditors' requirements of ISO 19011:2002 have been incorporated into ISO 17021:2011. Therefore, the mandatory reference to ISO 17021 is sufficient for demonstrating compliance with general requirements of ISO 19011 [2002].</p>	

Annex 6 of the PEFC TD, 3.2	PEFC PT 1005
Does the scheme documentation include additional qualification requirements for auditors carrying out forest management or chain of custody audits?	PEFC PT 1005, chapter 7.2.1 includes requirements for forest management auditors, including their education, working experience; auditing experience, training; etc.
Conclusion: Not mandatory requirement	

Annex 6 of the PEFC TD, 3.2	PEFC PT 1005
Does the scheme documentation require that certification bodies shall have established internal procedures for forest management and/or chain of custody certification?	PEFC PT 1005, ch. 9.1.1 requires the certification body to have documented procedures for performing and structuring forest management audits. In addition, ISO 17021 requires the certification body to have documented procedures for its activities.
Conclusion: Conformity Justification: The scheme satisfies the requirement through PEFC PT 1005 as well as through the general reference to ISO 17021.	

Annex 6 of the PEFC TD, 4	PEFC PT 1002, PEFC PT 1005
Does the scheme documentation require that applied certification procedures for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	PEFC PT 1002, ch. 4 and PEFC PT 1005 require compliance with ISO 17021.
Conclusion: Conformity Justification: PEFC PT 1002 and PEFC PT 1005 satisfy the requirement.	

Annex 6 of the PEFC TD, 4	PEFC PT 1002, PEFC PT 1005
Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	PEFC PT 1002, ch. 4 and PEFC PT 1005 require compliance with ISO 17021
Conclusion: Conformity Justification: PEFC PT 1002 and PEFC PT 1005 do not require that the certification procedures shall fulfil the general criteria of ISO 19011. However, the PEFC Council is referring to ISO 19011:2002 and the general requirements for certification process of ISO 19011:2002 have been incorporated into ISO 17021:2011. Therefore, the mandatory reference to ISO 17021 is sufficient for demonstrating the compliance with general requirements of ISO 19011:2002.	

Annex 6 of the PEFC TD, 4	PEFC PT 1002
Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates?	PEFC PT 1002, chapter 5 requires that the certification body shall provide CFFP with information on issued certificates, annually or as requested.
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1002 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	PEFC PT 1002, PEFC PT 1005
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?	<p>PEFC PT 1002, ch. 3 requires the certification body to control the usage of the PEFC Logo and its compliance with PEFC ST 2001.</p> <p>PEFC PT 1005, ch. 9.2.3 requires control of the PEFC Logo usage as a part of the initial certification audit.</p>
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1002 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	PEFC PT 1005
Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	<p>PEFC PT 1005, ch. 9.3 requires an annual surveillance audits.</p> <p>In addition, the annual surveillance audit is also required by ISO 17021 to which PEFC PT 1005 refers.</p>
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1005 as well as ISO 17021 require annual surveillance audits.</p>	

Annex 6 of the PEFC TD, 4	PEFC PT 1005
Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?	<p>PEFC PT 1005, ch. 8.2 require 3 years maximum validity of the certificate.</p> <p>The 3 years validity is also required by ISO 17021.</p>
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1005 has an explicit requirement for the certificate validity (3 years). In addition, PEFC PT 1005 requires compliance with ISO 17021 that also requires maximum 3 years period for re-certification audits.</p>	

Annex 6 of the PEFC TD, 4	PEFC PT 1005
<p>Does the scheme documentation include requirements for public availability of certification report summaries?</p>	<p>PEFC PT 1005, ch. 9.1.10 requires that the report of stage 2 audits shall contain a summary of the certified forest area and the audit results (i.e. a Summary Report). The report of stage 2 audit should contain, at least, information on the certified forest area; identification of the client organization; the scope of the certificate; brief description of the forest management system, namely the elements of public disclosure; summary of findings identified in the audit, including the evidence of the public consultation, where appropriate. The Summary report is then available from the client organisation and the CFFP's website.</p>
<p>Conclusion: Conformity Justification: PEFC PT 1005 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	PEFC PT 1005
<p>Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?</p>	<p>PEFC PT 1005, ch. 9.1.1 requires the certification body to have documented procedures for public consultation that ensure that stakeholders opinions about forest management are included amongst audit findings.</p>
<p>Conclusion: Conformity Justification: PEFC PT 1005 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	PEFC PT 1005
<p>Does the scheme documentation include additional requirements for certification procedures?</p>	<p>PEFC PT 1005 includes additional requirements for certification, surveillance and recertification audits as well as multi-site and group certification</p>
<p>Conclusion: Not mandatory requirement</p>	

Annex 6 of the PEFC TD, 5	PEFC PT 1002
<p>Does the scheme documentation require that certification bodies carrying out forest management and/or chain of custody certification shall be accredited by a national accreditation body?</p>	<p>PEFC PT 1002, ch.3 requires that the certification body shall be accredited by an accreditation body that is a member of EA (European co-operation for Accreditation) and/or IAF (International Accreditation Forum).</p> <p>PEFC PT 1002, ch. 5 requires the certification body to have an accreditation as the precondition for obtaining the notification from the CFFP.</p>
<p>Conclusion: Conformity Justification: PEFC PT 1002 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	PEFC PT 1005
<p>Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?</p>	<p>PEFC PT 1005, chapter 8.2 requires the certificate shall include an accreditation mark as prescribed by the accreditation body and the accreditation number.</p>
<p>Conclusion: Conformity Justification: PEFC PT 1005 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	PEFC PT 1002
<p>Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF's special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?</p>	<p>PEFC PT 1002, ch.3 requires that the certification body shall be accredited by an accreditation body that is a member of EA (European co-operation for Accreditation) and/or IAF (International Accreditation Forum).</p> <p>PEFC PT 1002, ch. 5 requires an accreditation as the precondition for obtaining the notification from the CFFP.</p>
<p>Conclusion: Conformity Justification: PEFC PT 1002 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	PEFC PT 1005
Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?	PEFC PT 1005, chapter 8.2 requires that the certificate shall include an accreditation mark as prescribed by the accreditation body and the accreditation number.
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1005 satisfies the requirement as the accreditation body’s mark/number guarantees that the certificate has been issued within the scope of valid accreditation.</p>	

Annex 6 of the PEFC TD, 5	PEFC PT 1002
Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	PEFC ST 1002, ch. 5 requires the certification body to submit an application for notification (Appendix 1) and to sign a notification contract (Appendix 2). The chapter also includes criteria for the notification issuance.
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1002 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 5	PEFC PT 1002
Are the procedures for the notification of certification bodies non-discriminatory?	PEFC PT 1002 does not include procedures that would be discriminatory for forest management certification bodies.
<p>Conclusion: Conformity</p> <p>Justification: PEFC PT 1002 satisfies the requirement.</p>	

8.7 Requirements for dispute settlement procedures in the administration of the PEFC scheme

8.7.1 Introduction and summary

The PEFC Council's requirements for the dispute settlement in the administration of the PEFC scheme are defined in PEFC GD 1004:2009, ch. 8.1 and require that "*The PEFC Council and the authorised bodies shall have written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme.*" The scope of the term "administration of the PEFC scheme" is further clarified as activities of the PEFC authorised body for a) PEFC notification of certification bodies, b) PEFC Logo usage licensing and c) operation of the PEFC Registration System.

PEFC PT 1001, chapter 10 introduces the complaints and disputes procedures of the CFFP and makes further reference to PEFC PT 1004.

PEFC PT 1004:2015, chapter 3 describes detailed procedures for complains and disputes relating to:

- a) The content of the Portuguese standard for SFM and the standard development procedures;
- b) The accreditation of certification bodies;
- c) The approach taken at the time of the certification of a particular forest, or chain of custody system by accredited, independent, third-party certification body;
- d) Issues concerning management of a specific forest area, or forest product supply chain,
- e) Administration of the PEFC scheme.

This term (Administration of the PEFC scheme) is then defined in chapter 4 of PEFC PT 1004 under complaint category 5 in compliance with PEFC GD 1004.

For this scope, PEFC PT 1004 defines the responsibility of the CFFP Advisory Council that appoints a specialised committee responsible for the complaints investigation and resolution; and communication between CFFP and the complainant.

PEFC PT 1004 complies with requirements of PEFC GD 1004 relating to the dispute settlement.

8.7.2 Detailed assessment

PEFC GD 1004, 8.1

8.1 ...the authorised bodies shall have written procedures for dealing with complaints relating to the governance and administration of the PEFC scheme.

The scope of PEFC PT 1004 covers the administration of the PEFC scheme as defined in PEFC GD 1004.

Compliance: Conformity

Justification: PEFC PT 1004 satisfies the requirement.

PEFC GD 1004, 8.2

8.2a [Upon receipt of the complaint, the procedures shall provide for]: acknowledgement of the complaint to the complainant

PEFC ST 1004, chapter 5 requires that the President [of the Advisory Council] will acknowledge the complainant within 10 days after receipt of the complaint and then convenes a meeting.

Compliance: Conformity

Justification: PEFC PT 1004 satisfies the requirement.

8.2b [Upon receipt of the complaint, the procedures shall provide for]: gathering and verification of all necessary information, validation and impartial evaluation of the complaint, and decision making on the complaint

PEFC PT 1004, chapter 5 requires that the Advisory Council shall impartially evaluate all gathered and available information and that a specialised committee will issue a decision within 2 months.

Compliance: Conformity

Justification: PEFC PT 1004 covers the requirement.

8.2c [Upon receipt of the complaint, the procedures shall provide for]: formal communication of the decision on the complaint and the complaint handling process to the complainant and concerned parties

PEFC PT 1004, chapter 5 requires to communicate the decision to the complainant and other concerned parties.

Compliance: Conformity

Justification: PEFC PT 1004 covers the requirement.

8.2d [Upon receipt of the complaint, the procedures shall provide for]: appropriate corrective and preventive actions.

PEFC PT 1004 does not make any reference to corrective or preventive actions.

Compliance: Conformity

Justification: Although the reference to the correction and preventive actions is missing, the conformity has been assigned based on the fact that the complaint investigation results in a recommendation of the Committee and final decision of CFFP. It is assumed that where applicable and reasonable, this recommendation and decision would automatically include a corrective and/or preventive measure.

Observation:

The missing reference to the corrective and preventive measures should be added in the future revision of the document.

Annex 1: Comments from the PEFC Council’s international consultation

Comment	Response
<p>In the national standard for Sustainable Forest Management NP 4406 2014:</p> <p>To add that “Forest Management Plan shall at least be clear, objective-based and include the justification of the average annual allowable cut” in order to comply with the criteria 5.1.5. of PEFC ST 1003:2010</p>	<p>NP 4406, A.1.2 requires the management planning to guarantee the quantity and the quality of forest resources and a balance between harvesting and growth rates.</p> <p>NP 4406 does not include an explicit requirement for the annual allowable cut and its justification. However, A.1.2 requires that information on “standing volume of main species” and on “standing volume available for harvesting” shall be available. This implies that the management planning shall work with allowable cut although not “annual”. The information on standing volume is, in principle, used to justify the allowable cut.</p> <p>The compliance with the PEFC requirement is based on the implicit interpretation of the NP 4406 standard. For more info, see detailed assessment of requirement 5.1.5.</p>
<p>To clearly require that exceptional circumstances for a plantation established by forest conversion after December 2010 to be eligible are : 1. That the forest conversion is not in High Conservation Value area or significant important biodiversity area or culturally important area for indigenous peoples ; 2. That the law has been respected ; 3. And that environmental benefits of the conversion can be demonstrated</p>	<p>NP 4406 includes identical requirements for forest conversion as PEFC ST 1003.</p> <p>However, it should be noted that the detail of the requirement, especially the scale of “permitted” conversion, allows for different interpretation. The conformity has been assigned based on assumption that the forest conversion is not the critical issue for forestry sector in Portugal and is also regulated and enforced by respective legislation.</p> <p>It should be noted that PEFC ST 1003 does not require to use the term High Conservation Value Forests (HCVFs).</p>

Annex 2: Stakeholders survey

TJConsulting organised a survey of Portuguese stakeholders relating to the standard setting process. An invitation to participate in the survey was sent out by e-mail to about 300 stakeholders identified by the ICNF during the stakeholder mapping.

For most questions, one organisation (Associação Transumancia e Natureza) positively responded to the survey questions on the standard setting process. The respondent stated that they have not been invited to nominate a representative to TC 145 but that they noticed the announcement of the start of the revision process by “direct mailing”. It should be noted that the direct mailing was done based on a letter that announced the revision process as well as included an invitation to stakeholders to join TC 145.

The stakeholders consultation questionnaire is presented below.

TJConsulting, Luxembourg

Stakeholders' questionnaire

Assessment of the Portuguese forest certification scheme
against the requirements of the PEFC Council

14 December 2014

Background

The Portuguese standard for sustainable forest management (NP 4406.2014) was revised during 2013 - 2014 and was submitted for endorsement by the PEFC Council.

The PEFC Council has selected TJConsulting to carry out the assessment of the standard and the Portuguese PEFC scheme against the PEFC Council requirements. The scheme assessment also includes consideration of stakeholders' comments and views presented within the international consultation announced by the PEFC Council at its website (www.pefc.org) and **this questionnaire that was directly distributed to stakeholders relevant to sustainable forest management in Portugal.**

TJConsulting would like to encourage all relevant stakeholders to provide information that will contribute as a valuable input necessary for the credible and impartial assessment of the Portuguese PEFC scheme.

Objective

This questionnaire aims at obtaining and considering stakeholders comments and views relating to the revision of NP 4406.2014 during 2013-2014, its openness, transparency, stakeholders participation and consensus building elements.

The questions used in this questionnaire are based on PEFC requirements included in PEFC ST 1001:2010 (Standard setting procedures – Requirements).

The questionnaire shall be returned to TJConsulting (tymrak@tj-consult.com) by **3 January 2014**. In case of an additional time needed, please contact Mr Tymrak directly.

Questionnaire

1. Contact details

Name of the organisation:
 Stakeholder group:
 E-mail:

2. Have you noticed a public announcement made by Instituto da Conservação da Natureza e das Florestas (INCF) or PEFC Portugal (CFFP) relating to the start of the standard setting/revision process?

- Yes No
- at the INCF / PEFC Portugal website
- by INCF/PEFC Portugal press release
- at public magazine and media
- by direct mailing

Note:

3. Did you have access to the standard setting procedures of the Technical Committee 145 (TC 145)?⁴

- Yes No

Note: Yes

4. Have you been invited to nominate your representative to Technical Committee 145 responsible for the revision of the standard(s) and consensus building?⁵

- Yes No
- by general invitation at the website, in media, etc.
- by direct mailing or other communication
- We have made a nomination that was
- accepted
- rejected

Note:

⁴ A written document containing organisation and procedures of the standard setting/revision process.

⁵ PEFC requires that the standardisation body shall establish a working group/committee with responsibilities for the development of a standard(s) and consensus building that is (i) accessible to stakeholders; (ii) has balance representation of stakeholders decision making and (iii) includes stakeholders with expertise in the subject matter and materially affected stakeholders (PEFC ST 1001:2010, 4.4).

5. Have you noticed the public consultation on a draft NP 4406.2014 standard April – May 2014?

- Yes No
- at the website
- by INCF / PEFC Portugal / IPQ press release
- at public magazine and media
- by direct mailing

Note:

6. Have you made comments during the public consultation and have they been considered?

- Yes, we have submitted comments No, we have not submitted comments

Our comments:

- were considered
- were not considered

Note:

7. Have you submitted any complaint relating to the standard setting/revision process?

- Yes No

Note: [Click here to enter text.](#)

For those stakeholders that had their representative in Technical Committee 145

8. Has the work of TC 145 been organised in an open and transparent way?⁶

- Yes No

Note:

9. Has TC 145 reached the consensus on the content of the NP 4406.2014 standard?

- Yes No

Note:

⁶ PEFC Council requires that members of the working group/committee responsible for the development of a standard(s) shall have access to draft documents in a timely manner; shall be given opportunity to participate in its work and submit their comments; their comments shall be considered in a transparent way.

Annex 3: Responses to the Panel of Experts' review

Report chapter / page	PoE member	Consultant's report statement	PoE member comment	Consultant's response
pp 2 & 10	HGM	Abbreviations	It is a minor point but it might help the reader if the list of abbreviations given on p10 came earlier, say after p 2.	Accepted
p 4	HGM	"TJConsulting recommends the submitted scheme for PEFC re-endorsement"	Agreed, the report is well laid out and clearly explains how this recommendation was reached.	No action required
p 17 second last para	HGM	"the standard that was <u>supposed</u> to be submitted to the IPQ"	Removed the word "supposed"	Accepted
p 18	HGM	"participation on ENGOs"	In this context perhaps more emphasis should be given to the fact that FSC Portugal was a member of CT 145.	<p>The fact that FSC Portugal is a member of CT 145 is described and argued in the detailed assessment of the standard setting process. For a number of arguments that are described in the detailed assessment this issue has not resulted in a non-conformity with the PEFC requirements but an "observation" that should be considered in the future revision of the standard.</p> <p>FSC Portugal can play a role of a communication channel to E-NGOs is a multi-stakeholder body rather than E-NGOs representative.</p> <p>However, even this fact does not change that E-NGOs' participation is limited. In addition, FSC Portugal is a multi-stakeholder body rather than E-NGOs' representative. FSC Portugal can play an important role in</p>

				communication to E-NGOs but does not replace participation of this stakeholder group.
p 22 "Process" second para	HGM	"However, only 75 members of either Economic, Social or Environmental Chamber"	Meaning not clear, reword.	Accepted
p 50	HGM	"The following issues should be considered in the next revision of NP 4406"	Perhaps the Board should be asked to seek a written assurance from the Portuguese that this will be the case.	Any follow up action is to be defined by the Board. However, to bring the issue of observation higher attention, they are also added to "Executive part" of the report.
p 74 PEFC ST 1003 5.5.4	HGM	3 rd para under NP 4406 "Organic and <u>an-organic</u> waste"	An-organic = inorganic	Accepted

Report chapter / page	PoE member	Consultant's report statement		Consultant's response
General	Cz		General statement: The assessment is done very thoroughly and detailed. Nevertheless, some of the "observations" should be challenged if a grading to "minor non-conformity" is justified (see comments below).	
4 / 4	Cz	Footnote 1: One minor non-conformity Setting process.	This footnote gives further details to the non-conformity and how to avoid it in the future – why is this content in a footnote rather than in the chapter 4 above?	Chapter 4 recommendation only includes those elements that are relevant to the Board's decision. There is action (Board's decision) required for the minor non-conformity relating to the standard setting but on the other hand the Board should be aware of the fact that there is one minor non-conformity relating to the standard setting and for this reason the text was inserted into the footnote rather than the body of the recommendation.
8.2.1 / 18	Cz	Headline: „Observations relating to the standard setting (revision) process“	Are the following points "observations" or rather "recommendations"?	They are observations, i.e. issues that do not cause non-conformity with the PEFC requirements; do not require to be resolved within the time limits specified by PEFC GD 1007; but are still relevant for the scheme's performance. So, the observations should be considered in the scheme revision.
8.4.1 / 49 and 50	Cz	However, the assessment is based on the following assumptions leading to the conclusion that the forest manager's compliance with the standard also ensures certain performance level of applied forest management practices: a) – f)	These sections describe substantial doubts and the conformity assessment is based on interpretations and assumptions. It could be argued that some of the observations are categorized as minor non-conformities; especially those which seem to be clarifications in the system only but are crucial for an unambiguous interpretation of the requirements. This concerns especially page 49 (a – f) and page 50 (b, c) and it is	The conformity assessment is based on NP 4406 standard that is sufficiently clear and unambiguous to allow conformity assessment. The issues summarised in chapter 8.4.1 and then detailed in chapter 8.4.2 are relevant to the compliance with the PEFC Council's requirements. The report describes certain issues and facts that the PEFC Council and the applicant should be aware of but also clearly describes the assessment

		<p>AND</p> <p>Observations to NP 4406</p> <p>The following issues should be considered in the next revision of NP 4406: a) – e)</p>	<p>recommended to check the classification (observation vs. minor non-conformity) of these points.</p>	<p>approach as well as justifications for the conformity statements.</p>
8.4.2 / 74	Cz	<p>Observation: It should be noted that the acronym “REN” is not explained in the standard, is not listed amongst the listed acronyms, is not generally known and cannot be otherwise deduced from the wording of the Standard.</p>	<p>How do forest managers know what to protect and how to plan if REN is neither explained nor generally known? How will this criterion effectively implemented? A grading as minor non-conformity should be discussed.</p>	<p>The observation stating that the term “is not generally known” relates to the international context of this assessment. It does not imply that the term is not know to the users of the standard.</p> <p>The term “REN areas” (National Ecological Reserve) is used in the standard as an example and as such does not have a normative character. In addition, the presence of the term in the standard was not used to justify conformity with any of the PEFC requirements.</p> <p>For those reasons, the missing inclusion of the term amongst other requirements was reported as “observation” rather than non-conformity.</p>
8.7 / 93	Cz	<p>Justification: Although the reference to the correction and preventive actions is missing, the conformity has been assigned based on assumption that where applicable the decision of the Board and the Advisory Council would also include corrective and/or preventive actions.</p>	<p>Is there any fact substantiating this assumption? If yes, please indicate, if not the compliance is not given and therefore should result in a “minor non-conformity”.</p>	<p>Text amended.</p> <p>CFFP dispute settlement procedures required that the complaint investigation shall result in a recommendation of the Committee/Advisory Board and a final decision of CFFP. It is assumed that where applicable and reasonable, this recommendation and decision would automatically include a corrective and/or preventive measure. (what else would the decision include?)</p>
Annex 2 / 95	Cz	<p>One organisation (Associação Transumancia e Natureza) for most questions positively responded to the survey questions on the standard setting process.</p>	<p>Is there an explanation why only one stakeholder (out of 300) answered the questionnaire – apart from the time of the year (around Christmas)?</p>	<p>The consultant is not aware of reasons behind the limited number of responses. The consultant has not received any request for prolongation of the commenting period (although this possibility was included in the invitation message).</p>

Report chapter / page	PoE member	PoE member comment	Consultant's response
	ME	TJConsulting has recommended that the Portuguese Forest Certification Scheme (PFCS) be re-endorsed under the PEFC's mutual recognition framework and I have no hesitation with agreeing with the recommendation which has been extensively substantiated by the consultant's report	No response required
	ME	Overall, I believe the consultant has completed an extremely thorough and professional assessment with significant explanations provided where required to provide evidence that the PFCS conforms with the PEFC requirements	No response required
	ME	The inclusion of the specific requirements from relevant PFCS scheme documents, the firm decision on the conformity status especially in bold to leave no doubt and the reasoning (or justification) behind that decision through relevant statement(s) provides for a comprehensive review of each of the PEFC requirements under its international sustainability benchmarks.	No response required
	ME	As is indicated by the consultant, the PEFC's forest management standard is meant to be a meta-standard. There seems to be many requirements which pick up PEFC requirements and repeat them for the Portuguese forest management standard – this of course provides conformance but it doesn't reflect on local/national conditions. I would expect this issue to be taken on board by CFFP in next revision of the standard	This is the objective of "observation" remarks. In addition the "observations" will be moved into the "executive summary" chapter
	ME	There is no need to include 'submitted' in reference to scheme or documents etc – this is a given for the re-endorsement process.	The word "submitted" emphasized that the consultant only made assessment of documentation that was submitted to him in English language.
	ME	When using 'however' near the beginning of a sentence, it is preferable to commence the sentence with 'However,' – 8.4.1 Assessed version of the standard & Observations to the NP 4406; 5.4.8	Accepted

	ME	Keep references to dates as day/month/year by ensuring that there are no breaks especially at the end of sentences e.g. [8] Pg 9; 1 st para. 7.1 Pg 11	Resolved through the “nonbreaking space”
	ME	Need to check body text for reference to PT 2014 documents as have PT 2015 in the list of documents (Pg 8) – it may be that the assessment was on the 2014 documents but the final scheme documents will be 2015 – may need an explanation	Accepted (caused by the fact that the documentation was revised during the assessment process and some references to 2014 version remained in the body of the text)
	ME	8.2.2 – where ‘submitted’ has been used, it may be preferable to substitute with ‘supporting’.	The word “submitted” emphasizes that the assessment and the conclusion was based on documentation that was submitted to the consultant and that is referenced in the list of “submitted” documentation.
	ME	8.4.2 has ‘NP 4406’ and ‘the standard’ as interchangeable terms for the one document – for consistency, I would suggest NP 4406 be used as it relates to the scheme and if there is a reference to the PEFC’s meta-standard, it be referred to as ‘the PEFC standard’	The report uses NP 4406 and “the standard” as interchangeable terms. Where the report refers to the specific chapter, it uses NP 4406, [chapter]. Where the report makes more general reference to the document, it uses “the standard”. Where the report refers to the PEFC Council requirements, it always refers to “the PEFC requirements” or “requirements of PEFC ST 1003”.
	ME	There are at least 12 observations made by the consultant, if I have counted correctly. While only one formal non-conformity is identified, the PEFC Board should be mindful of this many observations when making its recommendation of the PFCS. There may be several good reasons to condition some of the observations in the recommendation depending on the Board’s assessment of their overall impact on the PFCS’s integrity under the PEFC mutual recognition framework.	<p>PEFC GD 1007 defines non-conformities as those that shall be resolved before the endorsement (major) or at latest 6 months after the endorsement (minor).</p> <p>The observations where used outside the scope of PEFC GD 1007 to identify those issues that do not cause non-conformity with the PEFC requirements but are, in consultant’s view, relevant for the scheme performance, clarity, etc. It should be noted that in case of all “observations”, the report includes detailed justification on scheme’s conformity with the PEFC requirements.</p> <p>The observations are also introduced as “recommendations” for the future revision process.</p> <p>The Board can of course define additional conditions for those observations. For this purpose, the observations where also moved into the “Executive summary” chapter.</p>
	ME	The consultant’s stakeholder questionnaire asks all of the pertinent questions of the standard setting process for the	The consultant has very limited options to influence stakeholders to respond to the questionnaire.

		revision of the PFCS documentation. It is a pity that response rate wasn't more positive from the stakeholders	
4	ME	The minor non-conformity when associated with the term 'is not of such nature' would indicate that it doesn't involve the integrity of the scheme. Even though minor non-conformity is defined, it may be worthy indicating this position as part of the recommendation	This approach was requested by the PEFC Council to include in the recommendation only those aspects that are relevant to the endorsement decision. However, the reference to the minor non-conformity is made in the "footnote" on the same page.
5	ME	Sustainable forest management standard and Group forest management certification For consistency, the relevant scheme document should be in bold text Group forest management certification Also, the recommendation in group certification should be consistent with the other recommendations for bolded text Requirements for forest management certification bodies For consistency, need the part of the report where the requirements for FM certification bodies have been detailed i.e. 8.6.2	Accepted
6	ME	PEFC ST 2001:2008 seems to be missing from the list! Its in Pg 8 and Pg 13 along with ST 2002 and ST 2003 There are two differing dates for the tender dossier – 29 July 2014 in the PEFC documents and 27 July 2014 in the scheme's documentation In CFFP's documents – why is PEFC ST 2001:2008 in both columns? NSB-IPQ documents – wouldn't the ISO documents be worthy of being added to the list i.e. 17021, 17065 and 19011 [23] it's TC 145 not CT 145! Abbreviations – the following could be added to the list: CB	PEFC Council requirements against which the assessment was carried out (chapter 6) is based on tender dossier. The assessment does not include PEFC logo usage rules as the schemes are not supposed to develop their own requirements for the PEFC Logo usage. On the other hand, PEFC Portugal submitted PEFC ST 2001 as an evidence that they have adopted the document. The assessment did not cover compliance with ISO 17021, etc. but correct references to those documents. Typing error for reference [23] corrected Abbreviation: accepted partially, a coding of documents is not considered as an abbreviation (e.g. PT 1005:2015).

		E-NGO (usually the acronym is ENGO i.e. no dash required) GD, IGD, ILO, ST and PT, WHO	
7.2	ME	Why is the Public consultation row where it is when it is first in chronological order? Stage 1 assessment row – for the ‘documentation and evidence’, is this [1]-[21] or part thereof? May need to be more explicit Stage 2 assessment row - for the ‘documentation and evidence’, is this [22]-[31] or part thereof? May need to be more explicit For both of these comments, maybe need to indicate so as have referenced it	The table follows PEFC GD 1007 Submitted evidence [1]-[21] and [22]-[31] are clearly dated in chapter 6. However, it is not important whether the evidence was submitted based on initial request for information (Stage 1) or as response to the draft interim report (Stage 2).
7.3	ME	In the definitions, there is reference to ‘system’ but the title and all sections to here indicate that it is a ‘scheme’ – may need some clarifying text to tie these two terms together	The wording was taken from PEFC GD 1007 with a specific reference to a chapter of the document. In the context of the report, the terms are interchangeable.
8.1.1	ME	In the diagram – is it ‘Adopted from the PEFC Council documentation ’? CFFP’s documents (PT 1001, 1002, 1004 & 1005) are shown as 2014 but on Pg 8 they are 2015! PEFC ST 2001:2008 – has been referenced twice!	Accepted
8.2.1	ME	2 nd para. – use of ‘organisms’ – not usually used in English in this context – would suggest ‘entities’ may be better 5 th para. – FSC isn’t in the Abbreviations 5 th para. – last sentence – I’m not sure what is meant by this statement – please re-consider and re-phrase	Accepted
8.2.1	ME	2 nd para. – ‘Each chamber has an equal number of votes ...’ – is the overall allocation of votes in a chamber independent of the number of members in a chamber? 4 th para. – 2 nd sentence – I’m confused by the numbers in this para. - there are 107 entities but only other figure is 76 in previous paragraph	Text altered TC 145 includes voting members and observers.

		<p>These 107 entities – is this members and observers? If so, please make this clearer</p> <p>Where % has been used, would prefer the text of 'per cent' (and where used elsewhere in the report)</p>	
8.2.1 Stakeholders mapping	ME	<p>3rd para. – 1st sentence - WWF isn't in the Abbreviations</p> <p>Last sentence – was this through the draft report?</p>	<p>Accepted</p> <p>Yes, it was in the draft report. It should be noted that this issue is covered by the reported minor non-conformity.</p>
8.2.1 Announcement	ME	<p>2nd para. – need to clarify what meeting in the 1st sentence</p> <p>3rd para. – is it also the invitation with the announcement?</p> <p>Last para. – again, need to clarify what meeting</p>	<p>2nd para states that the announcement (with invitation) was distributed 14 days before TC 145 meeting.</p> <p>The announcement of the start of the revision process includes an invitation to stakeholders to join TC 145.</p> <p>The report altered.</p>
8.2.1	ME	1 st para. – it's TC 145 not TC 2014!	Accepted
8.2.1	ME	<p>1st para. – what was the public consultation on?</p> <p>3rd para. – is this the 300 mapped entities less those on TC 145?</p>	<p>The whole chapter 8.2.1 refers to the development/revision of the forest management standard NP 4406.</p> <p>TC 145 includes 107 entities (voting members and observers) and does not cover all 300 "mapped" entities.</p>
8.2.1	ME	<p>1st para. – use of 'supposed' – this indicates that it may or may not have occurred? Or should the term be 'proposed'?</p> <p>Only 26 members out of 76 voting members – this is significant in the overall consideration of the FM standard</p>	<p>Accepted</p> <p>The PEFC Council does not have specific requirements on a quorum for voting. Therefore, the assessment focused on whether or not all members of TC 145 were duly invited to the meeting and were aware of the agenda.</p>
5.2	ME	What would the 'their constraints' be?	This should be a part of the stakeholders mapping, could be resources (financial, human), lack of interest, affiliation and support to another scheme, etc.
8.2.2	ME	Isn't it 'the future' rather than 'the following' in terms of the revision process?	Accepted
	ME	4.2 Process – it would be better to describe the who in terms of 'its formal approval' rather than use 'its'	4.2: "its" refers to the document (OR TC 145) in the previous part of the sentence.

		<p>4.4 a Process – 3rd para. – the '33 participating member' hasn't been explained previously?</p> <p>4.4 b Process – 1st para. – whose comments?</p> <p>4.4 b Process – 2nd para. – 1st sentence has 106 entities but 2nd sentence has 75 entities – need to clearly differentiate between the numbers</p> <p>4.4.c Process – 1st para. need to insert the number for '... out of which are voting members ...'</p> <p>5.2 Procedures (Justification) – 'OR TC 145 ...' not TC 165 and "... requires to identify ..." who does it require?</p> <p>5.6 a Procedures – 'public enquiry' – I presume it's the public enquiry draft of the standard? Need to ensure proper term</p> <p>5.6 a Process – last para – 'beginning' for 'begging'!</p> <p>5.8 Process – last para – It is not clear whether the consultant is referring to this in the 2nd para of Process – I assume 1st sentence relates to 1st para. and 2nd sentence to 2nd para. but this is first use of 'final draft'</p> <p>5.8 a)-d) – Process – 1st para – 'the standard' is this the final draft?</p> <p>5.10 – Process – 2nd para. – 'deliverables' for 'deliveries'?</p> <p>6.1 – Process (Justification) – change 'edition' to 'version' to maintain consistency of language</p> <p>6.2 – Process – 1st para. – 'into forces' – would this be mandatory application?</p> <p>6.3 – Process – last para. – but an endorsed standard is already available until replaced by a newly endorsed standard – doesn't this provide seamless coverage?</p>	<p>4.4a: the sentence describes what was included in different submitted documentation. The next sentence states that the applicant clarified (as a response to the interim report) the different numbers.</p> <p>4.4b: "The comments to the interim report" is clearly referenced as [22], a document clearly referenced in chapter 6 submitted by the applicant.</p> <p>4.4.b: 2nd para: altered to differentiate between voting members and observers.</p> <p>4.4c: accepted</p> <p>5.2: accepted, OR TC 145 requires to identify...</p> <p>5.6a: OR TC 145 and the report refers to "public enquiry" as to the action (public consultation) not a document.</p> <p>5.6a: process: accepted</p> <p>5.8: accepted, final draft was added to the send para.</p> <p>5.8.a-d: Yes, this means a draft that wen for the formal approval.</p> <p>5.10: accepted</p> <p>6.1: accepted</p> <p>6.2: Yes. Explained in the justification.</p> <p>6.3: The observation does not question the "seamless" coverage but the fact that the new standard can be used before it is formally endorsed by the PEFC Council.</p>
8.3.1	ME	<p>2nd para. – Does this create a problem? It is just a different means of expression</p> <p>3rd to 5th para. – My take on this is that although there are two types of certification – regional and group – the language is</p>	<p>2nd para: The definition of FMU is not reported as a problem but an approach taken by the standard. PEFC Council understands this term as a geographical area where the management</p>

		similar for both and the requirements similar – the major factor would be the size of the area and the participants	decisions take place (a forest owner/manager/etc.) while the standard considers a region or group as the FMU. 3 rd to 5 para: This could be but not necessarily. The report does not state that this approach is non-conforming or wrong but that the requirements for group and regional certification could easily be merged as they are identical.
8.3.2	ME	4.1 c) – who or what is the ‘... written commitment with ...’? 4.2.1e) Justification – in English, the expression is usually ‘ on one hand or the other hand’ NOT side	4.1c: text taken directly from the standard. The text implies that the “subscribers” make written commitment [to the group/regional certification]. 4.2.1e:
8.4.1	ME	Scope and content of the standard Last para. – ‘... the standard’s concept ...’ of what?	The concept of the standard described in the text above.
8.4.1	ME	Assessed version of the standard 2 nd para – As the PoE doesn’t have access to this report and it has been raised by the consultant, some further explanation is required ‘... small changes and corrections ...’ – how does this fit in with consensus under TC 145?	The report states that this happened during the standard’s translation (English version) and that the “changes and corrections” were assessed against the original Portuguese version that remained unchanged. The consensus process applied to the Portuguese version of the document.
8.4.1	ME	Performance requirements of the standard ‘... is a certain doubt ...’ – is this the consultant’s doubt? If so, need to ensure the doubt is removed in the assessment	The chapter states that “there is a certain doubt” concerning the performance requirements; then it describes what constitutes the doubt and finally lists factors that mitigate the doubt to the “acceptable” level. The issue is also considered in the detailed assessment part of the report.
8.4.1	ME	Details of the Standard’s requirements 2 nd para. – ‘PEFC requirements’ – isn’t it forest management? 3 rd para. – ‘... regardless of the observations above ...’ – this is a significant statement which is borne out by the number of observations on Pg 50 – I would expect such if this type of statement has been used in the assessment	2 nd para: the whole chapter relates to the forest management, so “the PEFC requirements” refers to PEFC ST 1003 that is also mentioned later in the text. 3 rd para: The wording “regardless of the observations” was meant as “although there are observations”. The text has been altered to “taking into account the observations above...”

8.4.1	ME	Compliance with PEFC ST 1003 See previous comment on this term	The statement is based on detailed assessment of each requirement in PEFC ST 1003, including justification.
8.4.2	ME	4.1 c) 4 th para. - The term 'intervenient' is quite unknown to me as an English speaker – is this an issue in translation? Last para. – This is a comment and not evidence used for the assessment.	4 th para: The term “intervenient” is used by the standard as a noun; in English it is used an adjective. The report puts this word in inverted commas. The report does not make comments on the quality of the translation until the meaning of the text is clear as it is assumed that the standard is only applicable for Portugal; will only be used in its original Portuguese version. is and the English version only serves for the PEFC endorsement purposes. Last para: The comment is clearly referenced [22] as PEFC Portugal's comment. The comment was verified. The comment is relevant as the report only questions “individual certification” module and the context of the current standard's implementation in individual certification is relevant. It should be noted that it is used together with other aspects, evidence and argumentation in order to justify the conformity statement.
8.4.2	ME	5.1.7 2 nd para. – What of the 'period'? For example, FM standards every 5 years, anything for FMPs?	The standard (as well as the PEFC requirement) does not define specific time period for monitoring. It is assumed and understood that this period can differ based on “what is monitored”.
8.4.2	ME	5.1.11 Justification 2 nd para. – use of 'respective' – do you mean 'national'?	Yes, respective in sense of “applicable” legislation.
8.4.2	ME	5.3.8 1 st para. – repeated text!	Accepted
8.4.2	ME	5.4.5 Observation – spelling – change 'ilt's' to 'it's'	Accepted
8.4.2	ME	5.4.6 1 st para. – I don't see the connection of the evidence with the PEFC requirement 2 nd para. – This is OK but needs to cite examples applicable to the requirement	1 st para relates to the Standard's requirements for protection of watercourses and riparian areas. The riparian areas are significant elements in the ecological connectivity and as such this is relevant as explained in the justification. 2 nd para refers to “information sources” defined in the standard. They are then exemplified under the justification.

8.4.2	ME	5.4.12 1 st para. – use of 'cattle heads', do you mean 'herds'? (Also in 5.5.3)	The sentence is introduced by inverted commas indicating that this is quotation from the Standard. The assessment does not question the quality of English translation or typing errors until the meaning is understandable.
8.4.2	ME	5.5.4 Observation – the acronym needs to be explained by CFFP for this report	The acronym mean "National ecological reserve". The missing listing of the term amongst abbreviations was not considered as a non-conformity as (i) it is only used as an example and (ii) other wording of the Standard is sufficient for justifying the conformity.
8.4.2	ME	5.6.4 I'm in complete agreement with the consultant on this finding – while the requirement is quite extensive, the country situation should dictate the response of the PEFC national body in compliance	No response required
8.4.2	ME	5.6.6 The heading is NP 4406 and not MC&! (Natural Forest) – am I correct for consistency with all other requirements?	Accepted
8.5	ME	The recommendation – does this have a date?	The adoption of the PEFC ST 2002 is done through PEFC PT 1001. The date of PEFC PT 1001 approval should then be understood as the date of the PEFC ST 2002 adoption by the PEFC scheme.
8.6.1	ME	The recommendation should end in a full stop!	Accepted
8.6.2.1	ME	Coverage and scope of requirements 2 nd para. – I think that this is worthy of noting in the Executive Summary (5) or the Assessment process (7.2)	The reference to PEFC PT 1002 and PEFC PT 1005 is included in the Executive Summary.
8.6.2.1	ME	Certification and accreditation framework & PEFC notification of certification bodies Aren't the documents PEFC PT 1002 <u>NOT</u> ST 1002 which is the PEFC's group forest management certification requirements!	Accepted

8.6.2.1	ME	Certification and accreditation framework 3 rd para. – ‘... accreditation bodies to be signatories ...’ - If its IPAC, its in the singular	The scheme documentation uses plural “accreditation bodies”. However, this small inconsistencies has no impact on the compliance with the PEFC requirements.
8.6.2.2	ME	There are a number of references to PEFC ST 1002 or 1005 but I believe that it is PEFC PT 1002 or 1005	Accepted
8.6.2.2	ME	Page 85, middle box ‘... complete a training in audit ...’ what is it? ‘chapters 7.1, 7.2, 7.3.1 and 7.3.2 of ISO 19011 ...’ – maybe need to highlight what this refers to Justification 2 nd para. – maybe an observation to ensure the latest version of a document is applicable	Means that “chapter 7.2.1 requires that auditors shall complete a training in audit techniques” The specific coverage of the referenced chapters is not important within the context of the assessment. The issue is more complex as it is not clear whether Annex 6 of the PEFC Council Technical Document requires compliance with the 2002 version of 19011 or any future revision of the document. In any case, the fact that important elements of ISO 19011:2002 were incorporated into ISO 17021 satisfies the purpose of the PEFC requirement.
	ME	Justification – in other requirements, have used the relevant document i.e. PEFC PT 1002! Maintain consistency	Accepted
	ME	Page 89 3 rd box – I believe that this is the incorrect response as it’s the comment for the 1 st box and is the correct response for that requirement and not this requirement! I expect the response is N/A as there is no scheme specific CoC standard	The PEFC requirement applies to both forest management and CoC certification and is therefore relevant. The accreditation symbol, as explained in the justification, displayed on the certificate ensures (through the contractual relationship between the certification and accreditation body) that the certificate is issued as “accredited” certificate within the scope of a valid accreditation.
8.7	ME	There is no footer with page number from this section to the end of the document	Accepted
8.7.1	ME	4 th para. – which ‘term’? If related to term in 1 st para. the sentence should be moved to proved the clarification	The term “administration of the PEFC scheme”. (added to the sentence).
8.7.2	ME	8.2 b & c – use of ‘briefly’ – I presume the term would be ‘satisfactorily’? If so, need to indicate such even if the evidence was brief. Is it an observation for future amendment of PT 1004?	Accepted

8.7.2	ME	8.2 c – who is required to communicate the decision?	The chairman of the advisory committee.
	ME	8.2 d – this assumption must be based on best practice in complaints management – does the CFFP display such aptitude in this matter? I would have thought an observation for future amendment if there is no minor non-conformity	Accepted
	ME	Header for the questionnaire has the Annex 3 header details! The pages are after Annex 3	Not clear, the Header for the questionnaire has detail of Annex 2.