

# Conformity Assessment for the Revised Estonian Forest Certification Scheme Final Report August 21, 2015

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#### **Acronyms and Abbreviations:**

BOD Board of Directors

CoC Chain of Custody

CR Criteria

EA European Cooperation for Accreditation

EFCC Estonian Forest Certification Council

EFCS Estonian Forest Certification Scheme

EMSN Estonian Forest Certification Council (Estonian Acronym)

EST SFMS Estonian Sustainable Forest Management Standard

FMU Forest Management Unit

FMP Forest Management Plan

FMS Forest Management Standard

GD Guidance Document

GWGC GreenWoodGlobal Consulting, Ltd.

IAF International Accreditation Forum

IGD Internal Guidance Document

ILO International Labor Organization

IN Indicator

ISO/IEC International Standards Organization/International

**Electrotechnical Commission** 

N/A Not Applicable

PEFC Programme for the Endorsement of Forest Certification

PEFCC PEFC Council

PEOLG Pan-European Operational Guidelines

POE Panel of Experts

SFM Sustainable Forest Management

TBD To Be Determined

WHO World Health Organization

WG Working Group



#### 1. Introduction

#### 1.1 Scope of the Assessment

The scope of this assessment is to compare the Estonian Forest Certification Scheme with the minimum requirements of the PEFCC as stated in the PEFC Technical Documents and specified in PEFC IGD 1007-03:2012. This assessment shall ultimately provide the assessor's recommendation to the PEFC Board of Directors (BOD) as to whether the revised scheme is in conformance with PEFCC Technical Documents and whether the scheme should be recommended by the BOD for re-endorsement to the PEFCC General Assembly.

As specified in PEFC IGD 1007-03:2012, the following actions were taken to assess the conformity of the revised scheme to PEFCC requirements.

- A general analysis of the structure of the scheme technical documentation.
- Assessment of the standard setting procedures and process against PEFC ST 1001:2010, Standard Setting – Requirements
- Assessment of the forest management standard(s) against PEFC ST 1003:2010,
   Sustainable Forest Management Requirements
- Assessment of the group certification model against PEFC ST 1002:2010, Group Forest Management Certification - Requirements
- Assessment of the CoC standard(s) against PEFC ST 2002:2013, Chain of Custody of Forest Based Products – Requirements
- Assessment of the procedures for notification of certification bodies against PEFC GD 1004:2009, Administration of PEFC Scheme, Chapter 5
- Assessment of the procedures for logo licensing against PEFC GD 1004:2009,
   Administration of PEFC Scheme, Chapter 6 (\*Logo usage is only assessed with the initial scheme submission)
- Assessment of the procedures for complaints and dispute resolution against PEFC GD 1004:2009, Administration of PEFC Scheme, Chapter 8
- Assessment of the certification and accreditation procedures, as defined in the PEFC Council Technical Document, Annex 6 and PEFC ST 2003:2012, Requirements for Bodies Operating Certification Against the PEFC International Chain-of-Custody
- A stakeholder/working group survey to check the basic contents of the development report on the standard setting process.
- Results of PEFC International Consultation
- Any other aspects which can affect functions, credibility and efficiency of the submitted system.

#### 1.2 Assessment Process

The assessment process is carried out in two phases, each phase comprising several significant steps.

#### Phase I

- Step 1: Review the scheme documentation as provided by the National Governing Body, PEFC Estonia on 12.05.2014.
- Step 2: PEFCC initiated a 60-day public consultation by way of its website to gather comments from other PEFC National Governing Bodies as well as interested international stakeholders.
- Step 3: Develop Working Group stakeholder survey and submit it to WG members.
- Step 4: Scheme documentation (see Chapter 1.4) was assessed for conformance against PEFC GD 1007-01:2012 by the assessor.
- Step 5: The assessor communicated with PEFC Estonia asking for several evidentiary documents not included in the initial package of SFCS documentation.
- Step 6: Submission for review and comment of The Draft Report in both Microsoft Word and Adobe PDF to PEFCC and PEFC Estonia on 04.02.2015 providing a detailed evaluation of the Estonian Forest Certification Scheme based on PEFC IGD 1007-01:2012 requirements.

  The Draft Report contains the following elements, structure and content.
  - 1. Introduction
  - 2. GWGC Recommendations
  - **3.** Summary of Findings
  - **4.** Structure of the System and revised Estonian Forest Certification Scheme
  - 5. Standard setting process
  - 6. Forest Management Standard
  - 7. Group Certification Model
  - 8. Chain of Custody Standard
  - 9. Implementation of PEFC Logo Usage Rules
  - 10. Certification and Accreditation arrangements
  - **11.** Detailed assessment of the Complaints and Dispute Resolution Procedures against PEFC GD 1004:2009, Administration of PEFC Scheme, Chapter 8

#### 12. Annexes

- a. PEFC Standard Requirements Checklist
- b. Results of Stakeholder Survey (Final Report)
- c. Results of International Consultation
- d. Panel of Experts Comments (Final Report)
- e. Any Additional Relevant Information

#### Phase II

- Step 7: Review of PEFC Estonia responses regarding The Draft Report
- Step 8: Review surveys from respondents of the EFCS WG

Step 9: Review comments from PEFCC TU regarding The Draft Report

Step 10: Adjustments to report based on feedback from PEFCC TU and PEFC

Step 11: Draft Final Report and submit to PEFCC Panel of Experts

Step12: Review and respond to comments from Panel of Experts

Step 13: Present Final Report to PEFCC with recommendations to BoD

#### 1.3 Methodology Adopted

The following methodology was used by *GreenWoodGlobal Consulting*, *Ltd to* determine the level of conformity of the revised documents of the EFCS as outlined in **Scope of the Assessment**.

#### 1.3.1 Assessment of Documents

The assessment of the scheme and review of documents provided by PEFC Estonia (see Chapter 1.4) was conducted from the office of GreenWoodGlobal Consulting, Ltd. As this was a standard revision procedure by EFCC, a field visit was not required. The technical documentation provided in the EMSN was presented in English. However, a significant portion of supplemental evidentiary and corroborating documentation regarding standard setting processes and procedures was not provided with the original EFCS documentation or available on the internet as indicated by PEFC EST. It was eventually provided to the Assessor by PEFC EST.

The documents were assessed by Robert S. Simpson of GreenWoodGlobal Consulting, Ltd. The PEFC IGD 1007-01:2012 Minimum Requirements Checklists were used to assess conformance of the revised scheme against the minimum requirements for the reendorsement process as defined by the PEFCC. The Draft Report is formatted in accordance PEFC IGD 1007-03:2007.

The results of the assessment were documented in full in the Minimum Requirements Checklist and draft report was elaborated and submitted to PEFCC and PEFC Estonia for review and comment.

#### 1.3.2 Stakeholder Comments and Public Consultation

During the review and assessment of the documentation, the PEFC Secretariat held a 60-day open call for comments on the EFCS. Specifically, this was directed to PEFC National Governing Bodies and interested international stakeholders as well as other interested parties. This public consultation was held via the PEFC website (<a href="www.pefc.org">www.pefc.org</a>) and available for comment from 13 May through 12 July 2014. The results of the consultation were assembled into the report as defined in PEFC GD 1007-03:2012 and presented in Annex 3. One international comment was received by PEFCC. (See Annex 3)

Also, during the EFCS assessment period, the Assessor developed a survey for the EFCS Working Group (WGs) responsible for the scheme revision and other stakeholders involved in the process. A nine-question survey was then translated into Estonian and reviewed by Mr. Kristjan Tonisson of the EMSN for proper translation and grammar. The WG received

the survey by way of e-mail and was provided with a 10-day response period. Three surveys were received within the requested response period and an additional four followed. ( See Annex 2)

#### 1.4 Timetable of Assessment

The following timetable was submitted to the PEFC Secretariat for the assessment process.

Table 1

Timetable for PEFC Estonian Scheme Assessment			
Date	Action	Elapsed Time	
15.11.2014	Begin Phase I: Assessment of Estonian Scheme		
09.02.2015			
	and PEFC Estonia for review and comment*		
23.02.2015	Draft Report Review and Comment Period of PEFC	2 Weeks	
	Secretariat and PEFC Estonia		
24.02.2015	Commence Phase II of Assessment		
12.04.2015	Draft Final Report Submitted to PEFC Secretariat	5 Weeks	
26.05.2015	Draft Final Report Reviewed by the PEFC Secretariat And Submitted to PEFC Estonia for Discussion	5 Weeks	
02.07.2015	Draft Final Report Returned to Assessor with PEFC Estonia Supplemental Evidence of Conformance	6 Weeks	
05.07.2015	Draft Final Report Adjusted by Assessor to Reflect Supplemental Evidence Provided by PEFC Estonia	3 Weeks	
17.07.2015	Survey to Work Group Members	10 Days	
27.07.2015	Draft Final Report Resubmitted to PEFC Secretariat	5 Days	
31.07.2015	5 Submission to PEFC Panel of Experts for Review 7 Days		
20.08.2015	Inclusion of POE Comments	3 Days	
	Submission of Final Report to PEFC Secretariat		

# 1.5 Reference Documents and Sources

The following is a list of documents provided by PEFC Estonia to the PEFC Secretariat for the conformity assessment to evaluate for the re-endorsement of the EFCS.

Normative Documents Provided by PEFC Estonia:

PEFC National Forest Standard for Estonia

- PEFC EST Notification Procedures (rev.09 July2015)
- PEFC EST 2 The Procedure Requirements for the Certification of Forest Management and Chain-of-Custody (rev.05 July 2015)
- PEFC EST 3 Guidelines for Notification of the Certification Body (rev.05 July2015)
- PEFC EST 4 Guidelines for Certification Bodies and Auditors to Conduct Forest Management and Chain-of-Custody Certification (rev.05.07.2015)
- PEFC IGD 1007-01:2012 PEFC Standard and Minimum Requirements Checklist (rev,05 May 2015)
- PEFC National Forest Standard for Estonia (rev.05 July 2015)
- EST Annex 11 Standard Setting Procedures of Estonian Forest Certification Scheme (rev.29 June 2015)

#### Descriptive Documents Provided by PEFC Estonia

- Introduction to Estonian Forest Certification Scheme (rev. 05 May 2015)
- Scheme Revision Working Plan
- Scheme Description and Implementation Arrangements

## Supporting Documents Provided by PEFC Estonia

- Estonian Forest Certification Council Application for the PEFC Estonian Forest Certification Scheme
- Assessment Contract for the Revised Estonian Forest Certification Scheme
- Issuance of PEFC Logo Use License by PEFC Estonia
- Estonian PEFC Scheme Revision Description
- EMSN General Assembly Minutes 01 June 2010
- Scheme Revision Working Group Minutes
  - o 09 November 2010
  - o 02 December 2010
  - o 05 February2012
  - o 14 May 2012
- Copy of Public Invitation to Comment on the PEFC EST Forest Management Standard 20 February2012
- EMSN Board of Directors Minutes 20 September 2012
- EMSN Web Page Print Screen View: EMSN Contact Information
- EMSN Web Page Print Screen View: Working Group Members and Meeting Minutes
- EMSN Web Page Print Screen View: Scheme Revision Technical Documents 26 March 2009
- List of Working Group Members and Contact Information

The following list of technical documents was provided by PEFCC and used for the conformity assessment.

#### **Technical Documents Provided by PEFCC**

- PEFC GD 1001:2010 Standard Setting Requirements
- PEFC ST 1003:2010 Sustainable Forest Management Requirements
- PEFC ST 1002:2010 Group Forest Management Certification Requirements
- PEFC ST 2002:2013 Chain of Custody of Forest Based Products Requirements
- PEFC ST 2001:2008 PEFC Logo Usage Rules
- PEFC ST 2003:2012 Chain of Custody Certification Body Requirements
- PEFC GD 1004:2009 Administration of PEFC Scheme, Chapter 5
- PEFC GD 1004:2009 Administration of PEFC Scheme, Chapter 6
- PEFC GD 1004:2009 Administration of PEFC Scheme, Chapter 8
- PEFC GD 1007:2012 Endorsement of National Schemes
- Annex 6 PEFC TD Accreditation and Certification Procedures
- PEFC IGD 1007-01:2012 PEFC Standard and Minimum Requirements Checklist

In addition, the websites of PEFCC (<u>www.pefc.org</u>) and PEFC Estonia (<u>www.eramets.ee</u>) functioned as sources of additional information, processes and documents relevant to the conformity assessment.

#### 1.6 Personnel

Robert S. Simpson was the sole assessor involved in the project. He completed the PEFC Standard Assessor's Training in Geneva, Switzerland, November 2012. He has been involved with PEFC at some level from 1999 to present. He has served eight years on the PEFC Board of Directors and is intimately familiar with PEFC framework, as well as reviewing dozens of scheme assessments submitted to the PEFC Board from standard assessors.



#### 2. Recommendation

Based on the findings of GreenWoodGlobal Consulting, Ltd, and documented in the text and checklists of this report, the Assessor has identified <u>3 Minor Nonconformities</u> within the Estonian Forest Certification scheme and have no impact on the integrity of the scheme and are able to be rectified within reasonable amount of time. Therefore, the Assessor concludes that the Estonian Forest Certification Scheme to be **IN CONFORMANC**E to PEFCC requirements for scheme endorsement.

Therefore GreenWoodGlobal Consulting, Ltd. **recommends** the PEFC Board of Directors to **ENDORSE** the Revised Estonian Forest Certification Scheme **with conditions**.



# 3. Summary of Findings

#### 3.1 Structure of the System

PEFC Estonia functions as the national governing body of EFCS, administered by the Estonian Forest Certification Council (EMSN). PEFC Estonia acquired PEFC membership in November 2002. The EMSN is a not-for profit organization organized in October 2001 by a diverse group of forest owners and other relevant stakeholders. EMSN is the national administrative body having as a purpose to promote a sustainable management of forests according to the Programme for the Endorsement of Forests Certification scheme – PEFC. The EMSN is responsible for managing the EFCS and keeping it current with compliance to the PEFC requirements. It is also the duty of the EMSN to call for the revision of the EFCS every five years and to oversee the process. The EMSN is recognized as a legal entity with its own Board of Directors.

Some of the duties of the EMSN, with respect to the EFCS include:

- Operate as the official representative of PEFC Estonia
- Support and promote sustainable forest management through PEFC
- Oversee certification and accreditation of certification bodies
- Grant rights for the use of the PEFC logo
- Archive all relevant PEFC Estonia and EFCS documents
- Oversee EFCS standard setting and standard revision
- Oversee the dispute resolution process

The Estonian Forest Certification System (EFCS) has the overarching principles of implementing sustainable forestry practices in Estonia. It is also the intent of the EMSN to "promote the application of principles of sustainable forestry in Estonian forests by developing the forest certification model suitable for Estonian conditions and being in accordance with requirments of PEFC. The EFCS is in concert with international, national and regional legislation and is based upon requirements as defined in the Technical Documents of the PEFC Council. It was initially endorsed by PEFCC in 2008. The EFCS takes into account Estonian national forest legislation governing forest management, ownership structure, the national forest management planning system and other relevant criteria in Estonia. The EFCS allows regional, group and individual certifications.

The Assessor finds that the **Structure of the System is in conformity** with PEFCC requirements of their sustainability benchmarks.

#### 3.2 Standard Setting Procedures and Process

The standard revision process was overseen by the Estonian Forest Certification Council (EMSN) Board of Directors, based on PEFC EST Annex 11, Section 9 and guided by PEFC ST 1001:2010 – Standard Setting Requirements as of November 26, 2010. Additionally, the revision was guided by ISO/EC: Guide 59:1994 and ISO/EC Guide 2: 1996. Both the standard setting procedures and the standard setting processes for the revision were reviewed by the Assessor.

The revision process was initially begun by the EMSN as per EFCS requirements; PEFC EST Annex 11, Section 4. The process was commenced in March 2009 and a public announcement of the scheme revision process was posted on the EMSN website <a href="www.eramets.ee">www.eramets.ee</a>. On 26 March 2009 the public was invited to participate in the process of the scheme revision by submitting comments regarding the scheme.

During the rest of 2009 and into 2010 an internal review was made of the scheme and a gap analysis was developed between the current PEFC Estonia scheme and PEFC International. This was followed by public announcements of the revision and invitations to join the working groups through the newspaper and the website; <a href="www.eramets.ee">www.eramets.ee</a>. All interested parties were allowed to participate on a WG. These parties included representatives from forest owner organizations, forest industry, environmental and social non-governmental organisations, trade unions, retailers and religious organizations. In June, 2010, the EMSN Board of Directors agreed to form working groups and appointed members to the Working Groups.

Two formal Working Groups (WG) were established. One Working Group was assigned to develop the forest management standard. The second Working Group was assigned to develop Chain-of-Custody and Logo Usage standards. The composition of the WGs was diverse and set so that no single entity could control the process. In addition, the Working Groups had to reach consensus on the make-up of the Working Group membership. Minutes of the WG meetings (See Annex 4) demonstrated the make-up of the WG. The Working Group met, in an open and transparent process with consensus as the goal for all decision making on five separate occasions. On 5 February 2012 the decision was made by the WG to make the draft scheme revision available for public comment. On 20 February, 2012 the scheme was made available for a 60-day public consultation period. This was posted on the EMSN website and stakeholder organizations were notified through e-mails using the loodusaeg national listsery of Estonia's conservation and environmental organizations.

During the public consultation period three open forums were announced through the EMSN website and using the loodusaeg listserv, a national listserve of nearly 100 Estonian conservation organizations. These forums were held in three separate locations in Estonia from 10-17 April. The public comment period closed on 5 May 2012. Comments were submitted from four organisations: Estonia University of Life Sciences, Estonian Nature Protection Society, State Forest Management Centre and Estonian Private Forest Union. The WG carried out an analysis of all received remarks, proposals and suggestions. These were then followed up with comments back to the respective organizations.

The WG convened for the final time on 14 May 2012 and by unanimous vote, agreed to send the draft revised standard to the EMSN Board of Directors for endorsement. On 20 September 2012, the Board voted unanimously to approve the PEFC Estonia Forest Management Standard. On 20 November 2012, the EMSN convened to take a decision on the Chain-of-Custody Standard and the Logo Usage Rules Standard. Following discussion, an open vote was held. The EMSN Board of Directors unanimously agreed to adopt completely and without modification PEFC ST 2002:2010 Chain-of-Custody for Forest Based Products – Requirement and PEFC ST 2001:2008 – PEFC Logo Usage Rules-Requirements.

#### **Standard Setting Procedures**

The assessment of the PEFC Estonia standard setting procedures showed that written procedures for both the EMSN and the Working Groups are clear and objective. Areas of responsibility, instructions for formal adoption, record keeping, balanced representation of stakeholders, standard setting process, means of reaching consensus, processes and timelines for revisions of standards and other normative documents are all addressed, but lack clarity and specificity. The procedures for the WG are clear and adequately covered in the standard. The standard addresses WG transparency, balanced representation, stakeholders, public availability to documents and input, consensus building and dispute resolution. The standard setting procedures were well documented and all made available upon request. Surveys returned from members of the WG demonstrate that record keeping, WG access to working documents, public access and assuring participation of key and disadvantaged stakeholders were adequately provided during the standard revision process.

The Assessor finds that the **Standard Setting Procedures** to be **IN CONFORMANCE** with PEFCC requirements with **NO Minor Nonconformities** identified. (Refer to Section 5 for details)

#### **Standard Setting Processes**

The assessment of the standard setting processes was evaluated through the use of WG minutes, website screen shots and additional supplemental evidence such as WG member contact lists with their associated organizations listed, the national loodusaeg list serve with email addresses of the Estonia's conservation and environmental associations identified and from the WG/stakeholder survey responses administered by the Assessor.

Based on the preponderance of evidence and taken in its entirety, the Assessor finds that the **STANDARD SETTING PROCESSES** to be **IN CONFORMANCE** with PEFCC requirements with **1 Minor Nonconformity** identified. (Refer to Section 5 for details)

#### 3.3 Forest Certification Standard

The EFCS documentation identifies PEFC EST SFM as the PEFC National Forest Standard for Estonia. It states, "The document is produced on the basis of requirements of sustainable forest management, an international standard of the PEFC Council: Sustainable Forest Management Requirements – PEFC ST 1003:2010."

The EST SFM functions as the national standard and is applicable to all forests in Estonia seeking PEFC certification. The overarching objective of the Estonian Forest Certification Scheme is "to contribute to the implementation of principles of sustainable forestry in Estonia." The implementation of the scheme is to ensure the adherence of PEFCC principles regarding forest management and to warrant that forest-based products originating from PEFC Estonia certified forests as being managed in and internationally recognized sustainable manner. The scheme is in full compliance with international law, established by international conventions and ratified by the Republic of Estonia.

The following documents form the basis of the PEFC Estonia Scheme.

- Rio Convention on Biological Diversity
- International Labor Organization treaties
- Pan-European Criteria & Indicators for Sustainable Forest Management (Lisbon, 1998)
- Pan-European Operational Guidelines
- PEFC Technical Documents, including:
  - Annex 1: Terms and Definitions
  - o PEFC ST 1003:2010 Sustainable Forest Management Requirements

The EST SFM contains 19 criteria, 68 indicators and 15 sub-indicators. Criteria are defined in the EST SFM as "the principal characteristic features of forest management ensuring sustainable and effective development of forest management and conservation. Indicators are used to express "concrete volume in terms of objects or processes."

The Assessor finds that the **Forest Certification Standard** to be **IN CONFORMANCE** with PEFCC requirements with **2 Minor Nonconformities** identified. (Refer to Section 5 for details)

#### 3.4 Group Certification Model

PEFC Estonia provides a comprehensive set of requirements and guidance which defines how group entities and group participants can meet the appropriate requirements of PEFC EST 2; "The Procedure Requirements for the Certification of Forest Management and Chain of Custody." The normative technical documents defines the three certification methods available to forest owners, e.g. individual certification, forest manager certification and group certification. It describes the roles and responsibilities of the different parties involved. It defines and describes the duties of the Region/Group organizations, and the duties and responsibilities of the Region/Group representative. It also satisfactorily describes setting out group member responsibilities.

Certification for individual forest owners is covered in this document as well. It describes criteria necessary for forest owners in order to be eligible for individual certification and what processes the landowner must undertake to have his/her property properly certified.

PEFC EST 2 also covers Region/Group procedures for ingress and egress of members, database monitoring, auditing, corrective action procedures and group monitoring.

The Assessor finds that the **Group Certification Standard** to be **IN CONFORMANCE** with PEFCC requirements with **No Minor Nonconformities** identified. (Refer to Section 5 for details)

#### 3.5 Chain of Custody Standards

On November 20, 2012, the EMSN unanimously voted to adopt the PEFC Technical Document ST 2002:2010 Chain of Custody of Forest Based Products in its entirety and without modification. However, at the time of its adoption it had been replaced with PEFC ST 2002:2013, thereby making the CoC outdated. However, the criteria required for the PEFCC Chain of Custody requirements for forest-based products call for PEFC ST 2002:2013.

On July 7, 2015 PEFC Estonia updated their Chain of Custody Standard to adopt completely and without modification "Chain of Custody of Forest Base Products – Requirement (PEFC ST 2002:2013.)

The Assessor finds that the **Chain of Custody Standard** to be **IN CONFORMANCE** with PEFCC requirements with **No Minor Nonconformities** identified. (Refer to Section 5 for details)

#### 3.6 Logo Usage Rules

In an arrangement with PEFCC, the EMSN acts as the licensing body for PEFC logo use. Certification Bodies have the responsibility for authorizing logo use and informing PEFCC of any unauthorized use. On 20 November, 2012 the EMSN voted unanimously to adopt in its entirety and without modification PEFC ST 2001:2008 "PEFC Logo Usage Rules – Requirements".

The Assessor finds that the **Logo Usage Rules** to be **IN CONFORMANCE** to PEFCC requirements with **NO Minor Nonconformities** identified. (Refer to Section 5 for details)

# 3.7 Complaints and Dispute Resolution Procedures

The EMSN Board of Directors is responsible for overseeing dispute resolution procedures with regard to the certification of forest management and chain-of-custody. Following receipt of a formal and eligible complaint, the Chairman of the EMSN establishes a commission and a panel commissioner. The three-person commission reviews the complaint within 10 days of the filing of the complaint. The Commission reaches a decision through voting. The decision is considered final. The EFCS complaints and dispute resolution procedures set out a clear process for

receiving the complaint, instituting the dispute settlement body of impartial persons and the timeline for reaching settlement. The dispute settlement body (Commission) consists of three persons including a panel commissioner and must be independent and impartial.

The Assessor finds that the **Complaints and Dispute Resolution Procedures** to be **IN CONFORMANCE** with PEFCC requirements with **No Minor Nonconformities** identified. (Refer to Section 5 for details)

#### 3.8 Certification and Accreditation Procedures

The EFCS document clearly and completely describes the certification and accreditation processes. The National Accreditation Body has to be a member of the International Accreditation Forum and clear procedures for notification of certification bodies are in place.

Documentation and requirements are thorough and currently call for certification bodies to fulfil general criteria as defined in ISO 17021 and to undertake forest management certification based on ISO 17021 or ISO Guide 65.

The Assessor finds that PEFC EST 2, EST 3, EST 4 and "Notification of Certification Bodies for Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification scheme," taken in their enitirety are are in conformity

The Assessor finds that the **Certification and Accreditation Procedures** to be **IN CONFORMANCE** with PEFCC requirements with **1 Minor Nonconformity** identified. (Refer to Section 5 for details)

# 3.9 Other Aspects of Importance

The Assessor notes improper use of English and grammar called for a significant amount of interpretation needed for the conformity assessment. This need for interpretation caused significant delays with the assessment as the Assessor was spending much time trying to determine if the improper use of language and grammar was having an impact on the intent of the scheme presented. In addition, there are multiple grammatical errors throughout the documents, sometimes calling into question the spirit and intent of the criterion and calling for the Assessor to spend additional time seeking definitions and/or clarifications in other accompanying documents. The Assessor strongly recommends that with the next five-year convening of the Working Group, PEFC Estonia budget for a professional English translator/editor so that the relevant documents can be readily available in English to the future assessor.

Finally, the Assessor notes that many of the criteria and indicators copy directly from PEFC International. This should be avoided as it indicates a scheme dependent upon the international guidelines vs national input and interpretation to PEFC requirements.

#### 3.10 Stakeholder Survey

During the course of this assessment, the Assessor requested from PEFC Estonia the names, organizations and email addresses of the members of both working groups in order to survey them regarding the standard setting process. The survey was developed by the Assessor to help determine whether Working Group meetings were held in accord with PEFC Estonia standard setting procedures. Because the Chain-of-Custody Work Group met only once and decided to recommend full adoption of the PEFC Chain-of-Custody and logo usage rules, the Assessor believed it moot to survey them . However, all members of the forest certification standard Working Group were contacted through email and presented the survey, asking them to voluntarily respond within 10 days of receiving the survey. Six members of Working Group responded. (See Annex 2).

The Assessor finds that survey responses give an added measure of assurance that standard setting processes were in conformance to PEFCC requirements.



#### 4. Structure of the System

The Estonian Forest Certification System (EFCS) has the overarching principals for implementing sustainable forestry practices in Estonia. The EFCS is in concert with international, national and regional legislation and is based upon requirements as defined in the Technical Documents of the PEFC Council. It was initially endorsed by PEFCC in 2008. The EFCS takes into account Estonian national forest legislation governing forest management, ownership structure, the national forest management planning system and other relevant criteria in Estonia. The EFCS allows regional, group and individual certifications.

PEFC Estonia functions as the national governing body of EFCS, administered by the Estonian Forest Certification Council (EMSN). PEFC Estonia gained PEFC membership in November 2002. The EMSN is a not-for profit organization organized in October 2001 by a diverse group of forest owners and other relevant stakeholders. It is with the intent of the EMSN to "promote the application of principles of sustainable forestry in Estonian forests by developing the forest certification model suitable for Estonian conditions and being in accordance with requirments of PEFC.« EMSN is the national administrative body having a purpose to promote a sustainable management of forests according to the Programme for the Endorsement of Forests Certification scheme – PEFC. The EMSN is responsible for managing the EFCS and keeping it current with PEFC requirements. It is also the duty of the EMSN to call for the revision of the EFCS every five years and to oversee the process. The EMSN is recognized as a legal entity with its own Board of Directors.

Some of the duties of the EMSN, with respect to the EFCS include:

- Operate as the official representative of PEFC Estonia
- Support and promote sustainable forest management through the program of PEFC
- Oversee certification and accreditation of certification bodies
- Grant rights for the use of the PEFC logo
- Archive all relevant PEFC Estonia and EFCS documents
- Oversee EFCS standard setting and standard revision
- Oversee the dispute resolution process

Concerning standard setting activities, the following bodies participated in the revision process of the 2012 EFCS.

- EMSN responsible for planning the five-year revision, public announcements, administration of the process, announcing public consultation and acceptance of the revisions from the SFCS Working Group (WG)
- Director, PEFC Estonia

  responsible for administrating the WG and overseeing the standard setting process

 Working Group (WG) – body of interested stakeholder organization representatives directly participating in the standard revision process. They work under rules of consensus, transparency and are organized so that no single entity can control the process. Following the WG reaching consensus, they submit their revisions to the EMSN BOD for formal adoption.

The Assessor finds that the **Structure of the System** to be **IN CONFORMITY** with PEFCC requirements with **No Minor Nonconformities** identified. (Refer to Section 5 for details)



#### 5. Standard Setting Process

The general procedures and processes applied by the Working Groups (WGs) are documented in "Introduction to Estonian Forest Certification Scheme" and PEFC EST Annex 11 – Standard Setting Procedures. Verification of these processes through minutes, public invitation emails, etc., is provided in a more detail in Annex 4 of this report.

PEFCC requires that the standard setting process be assessed on two dimensions. First, a conformity assessment of the PEFCC requirements for <u>standard setting procedures</u> is made against the EFCS document PEC EST Annex 11 – Standard Setting Procedures as defined in PEFC ST 1001:2010. In addition, a conformity assessment of the EMSN <u>standard setting processes</u> is undertaken through evaluation of the EMSN document "Introduction to Estonian Forest Certification." This document provides a "narrative" of the standard setting process of the previously mentioned documents accompanied with evidentiary documentation of process such as minutes of meetings, public announcements of the revision, invitations to stakeholders, notice of public consultation period, etc. as defined in PEFC ST 1001:2010.

Refer to Chapter 4 for the general summary of the organization and the structure and responsibilities of the involved parties of EFCS revision. The following material provides a more detailed analysis of the standard setting procedures and processes, noting core findings and identifying nonconformities.

There were no significant areas of change with regard to the standard. PEFCC TU considered changes made to the standard as minimal and therefore pilot testing was not required.

The revision process was initially begun by the EMSN as per EFCS requirements in PEFC EST Annex 11, Section 4. The process was commenced in March 2009 and a public announcement of the scheme revision process was posted on the EMSN website <a href="www.eramets.ee">www.eramets.ee</a>. On 26 March 2009 the public was invited to participate in the process of the scheme revision by submitting comments regarding the scheme.

During the rest of 2009 and into 2010 an internal review was made of the scheme and a gap analysis was developed between the current PEFC Estonia scheme and PEFC International requirements for sustainability benchmarks. This was followed by public announcements of the revision and invitations to join the working groups through the newspaper and the website; www.eramets.ee All interested parties were allowed to participate. These parties included representatives from forest owner organizations, forest industry, environmental and social non-governmental organisations, trade unions, retailers and religious organizations. In June, 2010, the EMSN Board of Directors agreed to form working groups and appointed members to the Working Groups.

Two formal Working Groups (WG) were established. One Working Group was assigned to revise the forest management standard. The second Working Group was assigned to develop Chain-of-Custody and Logo Usage standards. The composition of the WGs was diverse and set so that no single entity could control the process. In addition, the Working Groups had to reach consensus on the make-up of the Working Group membership.

The WGs were made aware of project's operating rules and procedures. Specifically, the WGs were informed that they must act according to the principles of openness and transparency as defined in PEFC ST 1001:2010 Standard Setting - Requirements. In addition the following were also elaborated to the WGs.

- Working versions of the documentation are made available to all WG members,
- All members must have the ability to add their comments and proposals to the working versions of the documents,
- Comments and views of all WG members must be discussed in an open and transparent way and discussed.

The WGs were also informed that they would be operating under a consensus basis. Both WGs elected their own chairmen. A total of 2 meetings were held with the WGs. The process can be confirmed with supplemental evidence provided (See Annex 4). Meeting minutes indicate that the meetings were held in conformance to PEFC ST 1001:2010 requirements.

Minutes of the WG meetings (See Annex 4) demonstrated the make-up of the WG. The Working Groups met, in an open and transparent process with consensus as the goal for all decision making on five separate occasions. On 5 February 2012 the decision was made by the forest management standard WG to make the draft scheme revision available for public comment for a 60-day public consultation period. This was posted on the EMSN website and stakeholder organizations were notified through e-mails using the loodusaeg national listserv of Estonia's conservation and environmental organizations.

During the public consultation period three open forums were announced through the EMSN website and using the loodusaeg listserv. These forums were held in three separate locations in Estonia between 10-17 April. The public comment period closed on 5 May 2012. Comments were submitted from four organisations: Estonia University of Life Sciences, Estonian Nature Protection Society, State Forest Management Centre and Estonian Private Forest Union. The WG carried out an analysis of all received remarks, proposals and suggestions. These were then followed up with comments back to the respective organizations.

The forest management standard WG convened for the final time on 14 May 2012 and by unanimous vote, agreed to send the draft revised standard to the EMSN Board of Directors for endorsement. On 20 September, 2012, the Board voted unanimously to approve the PEFC Estonia Forest Management Standard. On 20 November, 2012, the EMSN convened to take a decision on the Chain-of-Custody Standard and the Logo Usage Rules Standard. The EMSN Board of Directors unanimously agreed to adopt completely and without modification PEFC ST

2002:2010 Chain-of-Custody for Forest Based Products – Requirement and PEFC ST 2001:2008 – PEFC Logo Usage Rules-Requirements. (See Table 1 for Standard Revision Milestones)

<u>Table 2. Forest Management Standard Setting Processes and Timelines</u>

	Milestones for the Revision of the Estonian Forest Certification Scheme			
Date	Action Taken	Resp	onsibility	Record
03.2009	EMSN agrees to move forward with revision of PEFC Estonia Forest Certfication Scheme	BOD	Director	Plan for the Modification of Estonian Scheme for Forest Certification
26.03.2009	EMSN Board of Directors notifies public through <a href="mailto:www.eramets.ee">www.eramets.ee</a> and <a href="mailto:loodusaeg@lists.ut.ee">loodusaeg@lists.ut.ee</a> . that scheme revision process has begun	BOD	Chairman	Website screenshot and email announcing revision process (See Annex 4).
2009 - 2010	EMSN internal gap analysis and review of initial stakeholder comments and requests to participate in process	BOD	Director	E-mail to stakeholders.  (See Annex 5–Stakeholder Invitation)
01.06.2010	EMSN Board of Directors meets and agrees to move forward with standard revision	BOD	Director	EMSN Board minutes (See Annex 4)
01.06.2010	EMSN invites stakeholder to participate in WGs	BOD	Director	Minutes of meeting (See Annex 4)
09.11.2010	Forest Management WG convenes	WG CI	nairman	Minutes of meeting (See Annex 4)
02.12.2010	Forest Management WG Meeting	WG CI	nairman	Minutes of meeting (See Annex 4)
05.02.2012	Forest Management WG Meeting	WG Chairman		Minutes of meeting (See Annex 4)
04.01.2012	Second call for public participation in standard revision	WG CI	nairman	Screenshot and email announcing public participation (See Annex 4)
02.02.2012	Commencement of 60-day public consultation	WG Chairman		Screenshot and email announcing public participation (See Annex 4)
10 – 17	Public forums reviewing standard and	WG Chairman		Screenshot and email
04.2012	seeking comments held for interested stakeholders in three locations in Estonia	EMSN Director		announcing public participation (See Annex 4)
02.05.2012	Public consultation closed	D	irector	4 comments received

14.05.2010	Forest Management WG Meeting to	Management WG Meeting to Not Needed Due to Minor		
	review results of public comment		Changes in the Standard	
14.05.2012	2 WG votes unanimously to send revised			
	draft forest management standard to			
	EMSN Council for endorsement			
20.09.2012	Meeting of EMSN Council to approve	BOD	Minutes of Meeting	
	EFCS for PEFC International			
	endorsement			

Both WGs consisted of representatives of organizations involved during the first standard development process in 2002 as well as those groups expressing interest to participate following the public announcement of the standard revision process.

These interests and description of the representative stakeholder groups are in Table 3.

<u>Table 3. Organizations Involved in the Estonian Process</u>

Estonian Forest Certification Scheme Working Group Organizations
Forest Owners
Estonian Private Forest Union
Wood-based Industry
Estonian Forest and Wood Industries Association
Environmental Non-Governmental Organizations
Estonian Society for Nature Conservation
Government Forest Agency
State Forest Management Center
Academia
Estonian University of Life Sciences
Luua Forestry School
Other Organizations
Estonia Private Forestry Centre

The Assessor finds that the **Standard Setting Procedures** to be **IN CONFORMANCE** with PEFCC requirements with **No Minor Nonconformities** identified below.

The Assessor finds the **Standard Setting Processes** to be **IN CONFORMANCE** with PEFC requirements with **1 Minor Nonconformity** identified below.

# Nonconformity PEFC ST 1001:2010 Standard Setting Requirements

# 5.6 The standardising body shall organise a public consultation on the enquiry draft and shall ensure that:

(f) a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.

#### Process:

**Minor Nonconformity:** No summary document was made available to the Assessor or provided with additional supplemental evidentiary documentation requested by the Assessor.



# 6. Forest Management Standard

#### **Background**

Forests cover nearly a half (48.2 percent) of the Estonian mainland territory. The general characteristics of forests have remained stable throughout the last decade. In 2012 the total forest area was 2.2 million hectares and total growing stock was 468 million cubic meters. The most common stands by dominant species are pine (32.9 percent of the total area of stands), birch (31.6 percent), spruce (16.2 percent) and grey alder stands (8.8 percent). According to the UN FAO Global Forest Resources Assessment (FRA), Estonia is in the fifth position in Europe based on forest coverage (share of forestland area in mainland territory) after Finland, Sweden, Slovenia and Latvia.

The forest types found in Estonia include a remarkable variety of ecologically valuable habitats, including deciduous swamp forests (14percent), herb rich forests with Picea abies (20percent), bog woodland(6percent) and mineral-rich springs, as well as coniferous forests on eskers and kames (4percent). Alvar forests (4percent) are a distinctive feature characteristic of Western Estonia.

38percent of the forests are privately owned, either by individuals or by small companies, while the state owns a further 38percent. The remainder of the forested area is without ownership and its future is unclear. The average size of a forest estate is five hectares and there are no big estates or large holdings controlled by a single company.

#### The Forest Management Standard

The EFCS documentation presented for this assessment identifies PEFC EST Sustainable Forest Management Standard as the PEFC National Forest Standard of Estonia. The EST SFM functions as the national standard and is applicable to all forests in Estonia seeking PEFC certification. The overarching objective of the Estonian Forest Certification Scheme is "to contribute to the implementation of principles of sustainable forestry in Estonia. The implementation of the forest managementstandard is to ensure the adherence of PEFCC principles regarding forest management and to warrant that forest-based products originating from PEFC Estonia certified forests as being managed in an internationally recognized sustainable manner. The forest management standard is in full compliance with international law, established by international conventions and ratified by the Republic of Estonia.

The following documents form the basis of the PEFC Estonia Scheme. Rio Convention on Biological Diversity

- International Labor Organization treaties (see Chart 1)
- Pan-European Criteria & Indicators for Sustainable Forest Management (Lisbon, 1998)
- Pan-European Operational Guidelines

- PEFC Technical Documents, including:
  - o Annex 1: Terms and Definitions
  - o PEFC ST 1003:2010 Sustainable Forest Management Requirements

Chart 1. ILO Conventions Ratified by Estonia

Ratification Status of ILO Conventions in Estonia			
Code	Convention	Date of Ratification	
ILO No 29	Forced Labor, 1930	1996	
ILO No 87	Freedom of Association and Protection of the Right to Organize, 1948	1994	
ILO No 98	Right to Organize and Collective Bargaining, 1949	1994	
ILO No 100	Equal Remuneration, 1951	1996	
ILO No 105	Abolition of Forced Labor, 1957	1996	
ILO No 111	Discrimination (Employment and Occupation) 1958	2005	
ILO No 138	Minimum Age for Admission to Employment, 1973	2007	
ILO 182	Worst Forms of Child Labor Convention, 1999	2001	

PEFC EST Sustainable Forest Management Standard Forest Management Standard comprises a series of increasingly focused requirements going from a defined criterion, to descriptive indicators and/or quantitative indicators. Table 4 below defines these components.

Table 4

Requirements of PEFC Estonian Forest Management Standard			
Component	Number	Definition	
Criterion	19	Requirement against which conformity assessment is made.	
Indicator	68	A quantitative or qualitative parameter which can be assessed in relation to a criterion. It describes objectively and unambiguously a relevant element of a criterion.	
Sub- indicator	15	Individual element or aspect of an indicator	

Since the 2008 endorsement of the EFCS, PEFC has added several new requirements with regard to forest management. Specifically, PEFC ST 1003:2010 Sustainable Forest Management Requirements have added requirements regarding forest conversion, use of WHO Type 1A and 1B pesticides, forests of high conservation value, protected and endangered species, core ILO conventions, free, prior and informed consent, and protection from illegal logging. These have been addressed in the revised standard. It was also determined that changes to the standard were minimal and that pilot testing the revised standard was not to be required.

The Assessor finds the **Forest Management Standard** to be **IN CONFORMANCE** with PEFCC requirements with **2 Minor Nonconformities** identified.

#### Nonconformity PEFC ST 1003:2010 Sustainable Forest Management - Requirements

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.

**Minor Nonconformity:** The Assessor cannot find mention of need to periodically update the management plan.

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 organizations, as appropriate.

<u>Minor Nonconformity</u>: The Assessor can find no reference or inference within the standard to indicate any relation to research and data collection needed for sustainable forest management or support relevant research activities carried out by other organizations, as appropriate.



#### 7. Group Certification Model

Estonia has approximately 97,000 private forest owner who manage about 38% of Estonia's forestland, or approximately 810,000 ha. The rest of the Estonian forest is owned by the government of Estonia. The average size of the private forest ownership in Estonia is almost 15 ha. Of the 97,000 private forest owners in Estonia, only about 6,500 are members of local private forest owners associations. Group certification is one method available to forest owners who wish to demonstrate to the public that they are managing their forests in a responsible and sustainable manner. PEFC Estonia offers Group Certification as one method for small private forest owners to certify their forest management practices in an economic and efficient method.

PEFC Estonia offers forest owners two forms of forest certification; individual forest management certification and group forest management certification.

PEFC Estonia offers a comprehensive set of requirements and guidelines for forest owner organizations to meet PEFC ST 1002:2010 Group Forest Management Certification. PEFC Estonia requirements can be located in the document PEFC EST 2: The Procedure Requirements for the Certification of Forest Management and Chain of Custody. These describe guidelines to enable organized groups of forest owners to establish themselves as certified under PEFC guidelines. PEFC EST 2 defines Group Forest Certification as "the certification of forest management of a group of small and medium sized forest owners." Owners having in excess of 10,000 ha are not eligible for group certification.

Forest owners are allowed to participate in the group certification regardless of the location of their property in Estonia. PEFC EST 2 sets out a clear and comprehensive set of expectations for the group organization and the group forest owner participant.

Duties and responsibilities for the group organization include, but are not limited to the following:

- Establishing the area which is considered certified.
- Informs forest owners about the benefits of group forest certification.
- Concludes contracts with forest owners participating in the certification process.
- Represents group certification participants to the certification body.
- Assists group forest owners with developing their forest management plan.
- Informs the group forest owners about the requirement of PEFC.
- Manages and administers the group database.
- Informs forest owners found to be out of compliance with the Standard
- Reports required data and information to the EMSN.

In return, group forest owners agree to the following:

- Comply with all relevant legislation as well as requirements of the Estonian Forest Management Standard.
- Inform the organization on changes in their forest ownership
- Ensure that forest contractors have valid certificates for operating in the forest.
- Cooperate with all audits and auditors.
- Comply with CARs in a timely manner.

PEFC Estonia group forest certification is a voluntary process and forest owners may enter and leave the group as they chose following proper notification.

The Assessor finds the **Group Certification Model** to be **IN CONFORMANCE** with PEFCC requirements with **No Minor Nonconformities** identified.



# 8. Chain of Custody Standard

The EFCS has adopted the PEFC ST 2002:2010 Chain of Custody of Forest Based Products in its entirety and without modification.

The document titled "Introduction to Estonian Forest Certification Scheme" states "In the 20 November, 2012 Estonian Forest Certification Council to the decision to adopt the PEFCC Technical Document PEFC ST2002:2010 - Chain of Custody of Forest Based Products — Requirements."."

However, prior to submission of the revised scheme for assessment, PEFC Council adopted PEFC ST 2002:2013 Chain of Custody of Forest Based Products, thereby making obsolete PEFC 2002:2010

On July 7, 2015 PEFC Estonia updated their Chain of Custody Standard to adopt completely and without modification Chain of Custody of Forest Based Products – Requirement (PEFC ST 2002:2013.)

The Assessor finds that the **Chain of Custody Standard** to be **IN CONFORMANCE** with PEFCC requirements with **No Minor Nonconformities** identified.



## 9. Implementation of PEFC Logo Usage

On 20 November, 2012, the Estonian Forest Certification Council voted to adopt PEFC ST 2002:2008 – PEFC Logo Usage rules – Requirements in its entirety and without modification.

Requirements for the use of the PEFC Logo and the issuance of logo using licenses are found in the document PEFC EST 2 - The Procedure Requirements for the Certification of Forest Management and Chain of Custody. The EMSN is the official manager of the PEFC logo on the basis of contractual arrangement between PEFC Estonia and PEFC Council. Therefore, EMSN is the licensing body in accordance to PEFC GD 1004:2009 - Administration of PEFC Scheme. The EMSN has the right to grant the right to the use of the PEFC logo. In addition, the contract stipulates that the right to use the PEFC logo may be granted by a regional or group representative to group members participating in the process of regional or group certification.

The Assessor finds the **Logo Usage Rules** to be **IN CONFORMANCE** to PEFCC requirements with **No Minor Nonconformities** identified.



#### 10. Certification and Accreditation Arrangements

Requirements of the EFCS for qualifications of certification bodies and auditors are documented in PEFC EST 3 – Guidelines for PEFC Notification of the Certification Body. This document covers requirements and qualifications for certification bodies for forest management systems and verification of chain of custody. These requirements are based on the following.

- Chain of Custody of Forest Based Products Requirements (PEFC ST 2002:2013)
- PEFC Technical Document Annex 6 Certification and Accreditation Procedures
- ISO/IEC 17021 Requirements for bodies providing audit and certification of management systems
- ISO Guide 65 General requirements for bodies operating product certification systems

The EFCS requires certification bodies must be legal entities, and must be accredited by a national or international accreditation body. The accreditation body must be a member of the EA and/or IAF.

Certification bodies must demonstrate technical competence with regard to the method of procurement and processing timber and forest based products. Compliance of these and other requirements will be verified by the national accreditation body. The EFCS call for certification bodies wishing to carry out certification must meet ISO/IEC 17021 for management systems and/or ISO Guide 65 requirements for Chain of Custody certification of forest-based products. However, PEFC Council adopted PEFC ST 2002:2013 prior to the Estonian standard revision being submitted for assessment and ISO Guide 66 has been replaced with ISO 17021. These were revised in the Estonian standard 05 July 2015.

Auditors must have adequate knowledge of the EFCS and have general knowledge of forest management and its environmental impacts. They must also fulfill general criteria for quality and environmental management systems auditors as defined in ISO 19011. Auditors involved with chain of custody certification must prove competence in wood procurement and material flows and supply chains within the forest industry.

The Assessor finds the **Certification and Accreditation Procedures** to be **IN CONFORMANCE** with PEFCC requirements with **1 Minor Nonconformities** identified.

#### Nonconformity Standard System Checklist of Certification and Accreditation (Annex 6)

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

<u>Minor Nonconformity</u>: Calling for surveillance audits to be carried out "at least one a year does not preclude them from exceeding 365 days between auditsh



#### 11. Complaints and Disputes Resolution Procedures

PEFC EST 4 – Guidelines for Certification Bodies and Auditors to Conduct Forest Management and Chain of Custody Certification fully describes the EMSN process for complaints and disputes resolution. The EMSN Board of Directors is responsible for overseeing dispute resolution procedures with regard to the certification of forest management and chain-of-custody. Following receipt of a formal and eligible complaint, the Chairman of the EMSN establishes a commission and a panel commissioner.

The panel Commissioner is a permanently Board-appointed position and maintains this position at the approval of the Board. This person must be impartial to the complaints and disputes registered with the EMSN. If it is determined that the Commissioner cannot be considered impartial, the Board has the right to appoint a new and impartial Commissioner. It is the duty of the Commissioner to preside over complaints and disputes hearings. In case of a panel tie-vote, the Commissioner may vote to break the tie.

The three-person commission is consists of the following; 1.) a representative of the EMSN, 2.) the person filing the complaint (complainant), or his/her authorized agent, and 3.) the person or his/her authorized agent against whom the complaint has been filed (defendant). Ineligible complaints are described in the EFCS as the following.

- An anonymously filed complaint
- A plaintiff without the right to file a complaint
- The plaintiff is currently involved in judicial liquidation proceedings
- The complaint is out of the jurisdiction of the EMSN

The Commission reviews the complaint within 10 days of its filing. The Commission reaches a decision through voting. The Commissioner delivers a copy of the decision to the Board as well as all parties involved within 2 working-days of the decision. The Decision is considered final.

The EFCS complaints and dispute resolution procedures set out a clear process for receiving the complaint, instituting the dispute settlement body of impartial persons and the timeline for reaching settlement.

The Assessor finds the **Complaints and Dispute Resolution Procedures** to be **IN CONFORMANCE** with PEFCC requirements with **No Minor Nonconformities** identified.



### Annex 1: PEFC Standard Requirements Checklist

### **Purpose**

The following standard setting checklists are included as part of PEFC GD 1007-01:2012. They were employed by the Assessor to aid and provide detailed analysis of compliance to the PEFC Council requirements for the EFCS scheme endorsement process.

### **Methodology**

The checklists are in tabular form and divided usually into 3 or 4 columns. The first column on the left documents the standard criteria and poses the question of conformance. For Part I Part I: Standard and System Requirement Checklist for standard setting (PEFC ST 1001:2010) the second column from the left denotes either Process or Procedure. The third column denotes either YES or NO with regard to conformance to PEFC requirements and at times N/A if the criteria is not applicable to the EFCS scheme. The final column on the right is the Assessors detailed reference to the EFCS documentation. For all other checklists The first column on the left documents the standard criteria and poses the question of conformance. The second column from the left denotes either YES or NO with regard to conformance to PEFC requirements and at times N/A if the criteria is not applicable to the EFCS scheme. The final column on the right is the Assessors detailed reference to the EFCS documentation.

EFCS criteria that were found to be in conformance to the PEFC Council International Benchmark Standards are indicated with a black YES and **CONFORMITY**. Those criteria found to have a minor non-conformity and do not violate the integrity of the certification system are denoted with a red NO and MINOR NONCONFORMITY. In case of a major non-conformity, which violates the integrity of the certification system, and needs addressing immediately, the criteria were marked with a red NO and noted as a bold, red MAJOR NONCONFORMITY.

### References, citations and descriptions of Scheme Documentation

Under the References to Application Documents column the Assessor used the following procedure.

The beginning line of the reference starts with the attribution of the ECFS relevant document and section (e.g. PEFC EST IN 1.3.4). When supporting documentation indicated that requirements were met by the EFCS, citations from the standard were copied and followed the document attribution. These citations were placed in quotations and italicized (e.g., "accredited certification bodies ..."). In instances when the Assessor captured the findings in his words the citations were not placed in quotations or italicized.

## **Legend**

"Yes/No" Column

YES – assessment shows **CONFORMITY** with PEFC International Benchmark Standards

NO – assessment shows **MINOR NONCONFORMITY** to the PEFC International Benchmark Standards

**NO** Major Non-conformance- assessment shows **MAJOR NONCONFORMITY** to PEFC International Benchmark Standards

N/A – not applicable

# Legend (cont'd)

"Reference to Application Documents" Column

"Black" – quotations from the EFCS standard documents placed in italics

Black – Assessor evaluations or overarching comments



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

## 1 Scope

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

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

# 2 Checklist

Question	Assess. basis*	YES /NO *	Reference to application documents			
Standardising Body						
4.1 The standardising body shall have written procedure	es for standard	-setting	activities describing:			
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	Yes	EST Annex 11, Sect.4: "A legal body established for promotion of implementation of principles of sustainable forestry in Estonian forests by developing the forest certification model suitable for Estonian conditions shall be responsible for coordination of standard setting process."  The "legal body" mentioned is currently the Estonian Forest Certification Council (EMSN) established 29 October, 2001. This same body also approves the final adoption of the standard as presented by the working groups.  EST Annex 11, Sect. 7.7: "All documents of Estonian			

Question	Assess. basis*	YES /NO *	Reference to application documents
			forest certification scheme have to be approved by the board of EMSN."
			EST Annex 11, Sect. 7.6: Working Groups are required to create "working methods that support the emergence of mutual understanding between the members of the working group. Matters and different points of view are discussed until a consensus is reached." CONFORMITY
b) the record-keeping procedures,	Procedures	YES	EST Annex 11, Sect. 7.4: "All meetings have to be documented and minutes of the meetings shall be sent to the EMSN who shall make them available for all interested parties.".  CONFORMITY
c) the procedures for balanced representation of stakeholders,	Procedures	YES	EST Annex 11, Sect. 3; "All relevant interested parties will be invited to participate in this process."  EST Annex 11, Sect. 6.1 "All interested parties shall be invited to participate in the process. The invited parties should represent the different aspects of sustainable forest
			management and include, e.g. forest owners, forest industry, environmental and social non- governmental organizations, trade

Question	Assess. basis*	YES /NO *	Reference to application documents
			unions, retailers and other relevant parties at national or sub-national level."
			CONFORMITY
d) the standard-setting process,	Procedures	YES	EST Annex 11 defines the standard setting process.  CONFORMITY
e) the mechanism for reaching consensus, and	Procedures	YES	EST Annex 11, Sect. 7.6: "the working group follows working methods that support emergence of mutual understanding between the members of the working group. Matters and different points of view are discussed until a consensus is reached. If consensus is not reached, the issue is handled by the Panel as regulated in Chpt.8"  EST Annex 11, Sect. 8: "Disagreement on the contents of the standards as well as appeals on the activities and procedures of the working groups are considered by a Panel that has a chairman and two members."  CONFORMITY
f) revision of standards/normative documents.	Procedures	YES	EST Annex 11, Sect. 7.11, "The review of the Standards is carried out if there are no changes in PEFC Council Technical documentation regarding to Standard structure and/or content and in cases when there are identified and approves the necessity for review of the Standards

Question	Assess. basis*	YES /NO *	Reference to application documents
			in the WG, but at least once every five years."  CONFORMITY
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.	edures publicly available and shall regularly review its dard-setting procedures including consideration of	YES	EST Annex 11, Sect. 7.4; "All meetings have to be documented and minutes of the meetings shall be sent to the EMSN who shall make them available to all interested parties."  EST Annex 11; Sect. 7.11; "The review of the Standards is carried out if there are changes in PEFC Council Technical documentation regarding to Standard structure and/or content and in cases when there are identified and approve the necessity for review of the Standards in the WG, but at least once in five years period."  CONFORMITY
	Process	YES	On 26March 2009, the EMSN posted on its website an announcement for the scheme revision with technical details about the standard setting procedure. (See Annex 4)
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.			EST Annex 11, Sect. 7.4: "All meetings have to be documented and minutes of the meetings shall be sent to the EMSN who shall make them available for all interested parties."  Annex 11, Sec. 10: "The documents related to the

Question	Assess. basis*	YES /NO *	Reference to application documents
	Procedures	YES	Estonian Forest Certification Scheme revision, including the normative documents shall be available electronically on the EMSN webpage and upon request from their storage location in EFCC office located at Mustamäe tee 50, Tallinn, Estonia. The documents shall be stored for a minimum of 5 years."  CONFORMITY
	Process	YES	The EMNS provided additional documentation to the assessor in the form of minutes and other meeting documentation (See Annex 4) demonstrating conformance to the process. Because they were able to access the records it leads the assessor to believe that there is record storage and maintenance occurring.
4.4 The standardising body shall establish a permanent or temporary working group/committee responsible for standard-setting activities.	Procedures	YES	EST Annex 11, Sect. 5: states that it is "recommended to form two working groups for standard setting: one for elaboration of forest management standard, the other for other parts of the certification scheme. If needed other working groups may be formed."  EST Annex 11, Sect 6, demonstrates that the

Question	Assess. basis*	YES /NO *	Reference to application documents
			for standard setting. "The EMSN arranges first meeting of working groups."  CONFORMITY
	Process	YES	EFCS process document "Introduction to Estonian Forest Certification Scheme" states' "The EMSN arranged the first meeting of the working groups." "All interested parties were invited to participate in the process."  Additionally, EMSN General Assembly minutes address the forming of working groups for the scheme revision and the appointments of the respective members. (See Annex 4)  CONFORMITY
4.4 The working group/committee shall:			
a) be accessible to materially and directly affected stakeholders,	Procedures	YES	EST Annex 11, Sect. 6.1; "The invited parties should represent the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, environmental and social non-governmental organisations, trade unions, retailers and other relevant organizations at national and sub-national level." Because of the size of Estonia, the assessor believes that all materially and directly affected stakeholders are addressed

Question	Assess. basis*	YES /NO *	Reference to application documents
			in the list.  CONFORMITY
	Process	YES	EST Annex 11, Sect. 6.1; "The invited parties should represent the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, environmental and social non-governmental organisations, trade unions, retailers and other relevant organizations at national and sub-national level," provides a comprehensive list assuring the assessor that materially and directly affected stakeholders have been identified.  On 26.March2009, the EMSN posted on its website a public announcement noting the scheme revision process was commencing and calling for public participation. (See Annex 4)  Responses from the Working Group survey indicate to the Assessor that efforts were made to reach materially and directly affected stakeholders. (See Annex 4)  Supplemental documentation provided by the EMSN (minutes, announcements, etc.) made publicly available (See Annex 4) demonstrate conformance to the

Question	Assess. basis*	YES /NO *	Reference to application documents
			assessor.  CONFORMITY
b) have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process, and	Procedures	YES	EST Annex 11, Sect. 6.1:  "The EMSN arranges first meeting of working groups." "The invited parties should represent the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, environmental and social nongovernmental organizations, trade unions, retailers and other relevant organizations at national or sub-national level."  Sect. 6.3; "Each party participating in the working group has equal opportunity to influence on the final result of the work."  CONFORMITY
	Process		EFCS process document "Introduction to Estonian Forest Certification" states, "The EMSN arranged first meeting of working groups." "The invited parties represented the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, [sic] ENGOs, trade unions, retailers," etc.  Minutes of the meetings demonstrate to the assessor that there is not more than one

Question	Assess. basis*	YES /NO *	Reference to application documents
		YES	representative from any of the different stakeholder groups participating. The Standard Setting working group was comprised of the following groups as witnessed in the minutes with one person representing each stakeholder organization.  • Estonian Society of Foresters • Estonian Private Forest Owners • Estonian University of Life Sciences • Estonian Federal Forest Wood Processing Plants • Estonian State Forestry Agency • Kulosari Centre  For a list of Working Group members, see Annex 4.  This information in its entirety demonstrates to the Assessor that this process is in conformance to PEFC requirements.  CONFORMITY
c) include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.	Procedures	YES	EST Annex 11, Sect. 6.1: Annex 11, Sect. 6.1: "The EMSN arranges first meeting of working groups." "The invited parties should represent the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, environmental and social nongovernmental organizations, trade

Question	Assess. basis*	YES /NO *	Reference to application documents	
			unions, retailers and other relevant organizations at national or sub-national level."  CONFORMITY	
	Process	YES	EFCS process document "Introduction to Estonian Forest Certification" states, "The EMSN arranged first meeting of working groups." "The invited parties represented the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, [sic] ENGOs, trade unions, retailers," etc.  (See Annex 4 for a list of Working Group members.)  CONFORMITY	
4.5 The standardising body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders.	Procedures	YES	EST Annex 11, Sect 8 defines procedures for addressing "disagreements on the contents of the standards as well as appeals of the activities and procedures of the working groups" CONFORMITY	
	Process	YES	No complaints logged.  CONFORMITY	
4.5 Upon receipt of the complaint, the standard-setting body shall:				
a) acknowledge receipt of the complaint to the complainant,	Procedures	YES	EST Annex 11, Sect. 8, para. 3: "Issues are addressed in writing to the EMSN, which shall acknowledge the receipt of the complaint to	

Question	Assess. basis*	YES /NO *	Reference to application documents
			the complainant"
			CONFORMITY
	Process	YES	No Complaints Received
b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint, and			EST Annex 11, Sect. 8 calls for the EMSN to appoint "an impartial chairman to the Panel."
	Procedures		"Issues are addressed in writing to the EMSN, which shall deliver the material immediately to the chairman of the Panel, who initiates the handling of the issue without delay."
		dures YES	"The Panel gives its decision in writing. The decision includes a short description of the matter, justification and the outcome of the panel."
			"The Panel informs the working group and EMSN about its decision. The decision of the Panel is final."
			CONFORMITY
	Process	YES	No complaints received.  CONFORMITY
c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	Procedures	YES	EST Annex 11, Sect. 8: "The Panel informs the working group and EMSN about its decision. The decision of the Panel is final."  EST Annex 11, Sec. 8, Para. 4: "The complainants outside the working group will be informed about the outcome of the complaint through their contact

Question	Assess. basis*	YES /NO *	Reference to application documents
			information, and through email list loodusaeg@lists.ut.ee. Additionally the information will be published at www.erametsaliit.ee."  CONFORMITY
	Process	YES	No complaints received.  CONFORMITY
4.6 The standardising body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	Procedures	YES	EST Annex 11, Sect. 8, para.  2: "Issues are addressed in writing to the EMSN, which shall deliver the material immediately to the chairman of the Panel."  The Assessor notes that the EMSN is an organization with an address as follows:  Estonian Forest Certification Council • Mustamäe tee 50 • 10621 Tallinn • Estonia  This address is publicly available on their website.  CONFORMITY
Standard-setting	process		
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	Procedures	YES	EST Annex 11, Sect. 6.1: "The EMSN arranges the first meeting of the working groups."  "The invited parties should represent the different aspects of sustainable forest management and include, e.g. forest owners, forest industry, environmental and social non-governmental

Question	Assess. basis*	YES /NO *	Reference to application documents
			organizations, trade unions, retailers and other relevant organizations at national or sub-national level."
			CONFORMITY
	Process	YES	Introduction to Estonian Forest Certification Scheme, page 2, para.9; "The EMSN arranged first meeting of working groups. The EMSN called in members of the former working groups and as comprehensively as possible other stakeholders of forestry sector." On 01 June 2010, the EMSN General Assembly appointed members of the Working Group (See Annex 4) for a list of Working Group members. This information in its entirety demonstrates to the Assessor that this process is in conformance to PEFC requirements.  CONFORMITY
5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.	Procedures	YES	EST Annex 11, Sec. 6, IN 6.1: "The EMSN arranges first meeting of working groups. All interested parties shall be invited to participate in the process. Special care shall be taken to ensure that the invitation reaches key stakeholders as well as less-favored and disadvantaged stakeholder groups and efforts shall be made to encourage and

Question	Assess. basis*	YES /NO *	Reference to application documents
			proactively seek their input to the process."  CONFORMITY
	Process	YES	Introduction to Estonian Forest Certification Scheme, para. 3: "The process of development of certification criteria was initiated by Estonian forest owners and organisations of Estonian forest sector. All relevant, interested parties were invited to participate in the process."  Para 4: "The EMSN called in members of the former working groups and as comprehensively as possible other stakeholders of the forestry sector."  Noting the comprehensiveness of the listserve (See Annex 4), Working Committee responses to the survey (See Annex 4)and the relative size of the country, the Assessor is satisfied that this process meets PEFC requirements.  CONFORMITY
5.3 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions.	Procedures	YES	EST Annex 11, Sect. 3: states only "All relevant interested parties will be invited to participate in the process. The standardsetting process shall be announced publicly on the web-page of the Estonian Forest Certification Scheme as well as on the forest and environment related mailing lists, such as

Question	Assess. basis*	YES /NO *	Reference to application documents
			loodusaeg@lists.ut.ee." CONFORMITY
		YES	On 26 March 2009 the EMSN publicly announced the beginning of the Estonian forest certification scheme. In the same announcement it made an open call for interested stakeholder to participate. (See Annex 4).
	Process		In addition, an announcement and invitation to participate went out through a national listserv of conservation and environmental organizations. (See Annex 4).
			This information in its entirety demonstrates to the Assessor that this process is in conformance to PEFC requirements.
			CONFORMITY
5.3 The announcement and invitation shall include:	I	1	
			EST Annex 11, Sec.3, Para.2, sub-para. 1: "The announcement shall include:
a) information about the objectives, scope and the steps of the standard-setting process and its timetable,	Procedures	edures	- information about the objectives, scope and the steps of the standard-setting process and its timetable;"  CONFORMITY
	Process		The EMSN made several postings on its website informing stakeholders of 54

Question	Assess. basis*	YES /NO *	Reference to application documents
		YES	the upcoming revision procedure and inviting them to participate.  (See Annex 4 for screen shot with details.)  CONFORMITY
b) information about opportunities for stakeholders to participate in the process,	Procedures	YES	EST Annex 11, Sec. 3, para.2, sub-para 2 -3: "The announcement shall include:  - an invitation to stakeholders to nominate their representative(s) to the working groups/committees;  - an invitation to comment on the scope and the standard-setting process using the contacts provided in the announcement;"  This information in its entirety demonstrates to the Assessor that this process is in conformance to PEFC requirements.  CONFORMITY
	Process	YES	On 26 March 2009, the EMSN posted on its website an announcement stating that the Estonia PEFC forest certification standard revision process was beginning and calling or interested stakeholders to participate. (See Annex 4)  In an email from Mart Kelk through the listserve loodusage@lists.ut.ee and dated 04 January 2012, a

Question	Assess. basis*	YES /NO *	Reference to application documents
			second announcement was made regarding the revision of the EFCS and invited all interested parties to respond. The text of the message translates as follows. "Estonian Forest Certification Council has begun working with stakeholders to Estonian PEFC forest management standard modification.  We ask all interested parties to send their proposals to the standard eeln6usse e-mail address: mart.kelk@mail.ee"  (See Annex 4 – Invitation to Comment on the Standard)  This information in its entirety demonstrates to the Assessor that this process is in conformance to PEFC requirements.
(c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,	Procedures	YES	Annex 11, Sec. 3, para , sub-para2: "The announcement shall include: - an invitation to stakeholders to nominate their representative(s) to the working groups/committees;" Annex 11, Sec. 3. Para 3: "Special care shall be taken to ensure that the announcement reaches key stakeholders as well as less-favored and disadvantaged stakeholder groups and efforts shall be made to encourage and

Question	Assess. basis*	YES /NO *	Reference to application documents
			proactively seek their input to the process."
			Annex 11, sec. 3, para 1: "The standard-setting process shall be announced publicly on the web-page of the Estonian Forest Certification Scheme as well as on the forest and environment related mailing lists, such as loodusaeq@lists.ut.ee."
			The Assessor believes that considering the preponderance of evidence and the relative size of the country, this to be in conformance with PEFC requirements.
			CONFORMITY
			On 26 March 2009, the EMSN posted on its website an announcement stating that the Estonia PEFC forest certification standard revision process was beginning and calling or interested stakeholders to participate. (See Annex 4)
	Process	YES	In an email from Mart Kelk through the listserve loodusage@lists.ut.ee and dated 04 January 2012, a second announcement was made regarding the revision of the EFCS and invited all interested parties to respond. The text of the message translates as follows. "Estonian Forest Certification Council has begun working with stakeholders to Estonian

Question	Assess. basis*	YES /NO *	Reference to application documents
			PEFC forest management standard modification.
			We ask all interested parties to send their proposals to the standard eeln6usse e-mail address: mart.kelk@mail.ee" (See Annex 4 – Invitation to Comment on the Standard)
			See Annex 4 for national listserve for Estonian conservation and environmental organizations.
			This information in its entirety demonstrates to the Assessor that this process is in conformance to PEFC requirements.
			CONFORMITY
			EST Annex 11, Sec. 3, para. 2, sub-para 3: "The announcement shall include:
	Procedures	YES	- an invitation to comment on the scope and the standard-setting process using the contacts provided in the announcement;"
d) an invitation to comment on the scope and the			CONFORMITY
standard-setting process, and	Process	YES	On 26 March 2009, the EMNS posted on their website a notification regarding the commencement of the standard revision process.
			On 04 January 2012, a second public announcement was made to all interested parties to comment on the standard

Question	Assess. basis*	YES /NO *	Reference to application documents
			revision and the process. (See Annex 4)  CONFORMITY
	Procedures	YES	EST Annex 11, Sec.3, para 2, sub-para 4: "The announcement shall include: - reference to publicly available standard-setting procedures."  CONFORMITY
reference to publicly available standard-setting ocedures.	Process	YES	On 26 March2009 the EMNS posted on their website a notification regarding the commencement of the standard revision process. All required documents were posted.  (See Annex 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	YES	EST Annex 11, Sec. 6, IN 6.1: "The EMSN arranges first meeting of working groups. All interested parties shall be invited to participate in the process. Special care shall be taken to ensure that the invitation reaches key stakeholders as well as less-favored and disadvantaged stakeholder groups and efforts shall be made to encourage and proactively seek their input to the process. The invited parties should represent the different aspects of sustainable forest management and include,

Question	Assess. basis*	YES /NO *	Reference to application documents
			e.g. forest owners, forest industry, environmental and social nongovernmental organisations, trade unions, retailers and other relevant organisations at national or sub-national level."  EST Annex 11, Sec. 6.2  "Participation in the
			working groups shall be organised according to its respective consensus."
			The Assessor believes the evidence presented demonstrates this to be in conformance with PEFC requirements.
			CONFORMITY
			On 26 March 2009, the EMNS posted on their website a notification regarding the commencement of the standard revision process.
	Process	YES	On 04 January 2012, a second public announcement was made to all interested parties to comment on the standard revision and the process. (See Annex 4)
			On 14 May 2012, the WG reviewed all comments on the Estonian forest management standard. (See Annex 4)
			CONFORMITY

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

Question	Assess. basis*	YES /NO *	Reference to application documents
a) working drafts shall be available to all members of the working group/committee,	Procedures	YES	EST Annex 11, Sec. 7, IN 7.5: "Working drafts of the standard are to be made available within reasonable time to the working group members on the EMSN webpage."  CONFORMITY
	Process	YES	Stakeholder survey responses indicate that working drafts were readily available to WG members. (See Annex 4)  CONFORMITY
	Procedures	YES	EST Annex 11, Sec. 7, IN 7.5," Working groups shall elaborate the projects of the parts of the standard or projects of amendments to the standard through and open and transparent discussions."  CONFORMITY
b) all members of the working group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts, and	Process	YES	EFCS process document "Introduction to the Estonian Standard' states, "Working groups elaborated the parts of standard through open and transparent discussions."  Additional evidence from stakeholder survey results confirms this. (See Annex 4).  With this evidence the Assessor believes this process to be in conformance with the PEFC requirement.  CONFORMITY

Question	Assess. basis*	YES /NO *	Reference to application documents
		YES	EST Annex 11, Sect. 7.4:  "All meetings have to be documented and minutes of the meetings shall be sent to the EMSN who will make them available to all interested bodies."
	Procedures		EST Annex 11, Sec. 7, IN 7.6: "Matters and different points of view are discussed until a consensus is reached."
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.			EST Annex 11, Sec. 7, IN7.5,"Working groups shall elaborate the projects of the parts of the standard or projects of amendments to the standard through and open and transparent discussions."  CONFORMITY
	Process	YES	Stakeholder survey responses indicate that working drafts were readily available to WG members. (See Annex 4)  CONFORMITY
5.6 The standardising body shall organise a public consultation	on on the enqu	iry draf	t and shall ensure that:
a) the start and the end of the public consultation is announced in a timely manner in suitable media,	Procedures	YES	EST Annex 11, Sec. 7, IN 7.9: "Before Standard is approved by the board of the EMSN, the EMSN shall ensure the public consultation process lasting at least 60 days. The EMSN shall make an announcement of the public consultation of the standard on its webpage and through the mailing list loodusaeg@lists.ut.ee. The

Question	Assess. basis*	YES /NO *	Reference to application documents
			announcement shall specify:
			- the start and the end of the consultation;"
			CONFORMITY
	Process	YES	On 20 February 2012 the public was informed through the EMSN website and personal emails of the 60-day open public consultation period for the revised Estonian forest management standard. The public was invited through e-mails through the national listserve (See Annex 4)
b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable,	Procedures	YES	Annex 11, Sec. 7, IN 7.9: "The EMSN shall make an announcement of the public consultation of the standard on its webpage and through the mailing list loodusaeg@lists.ut.ee."  Annex 11, Sec. 7, In 7.9, para.2: "Special care shall be taken to ensure that the announcement reaches key stakeholders as well as less-favored and disadvantaged stakeholder groups and efforts shall be made to encourage and proactively seek their input to the standard."  The Assessor notes that the list loodusaeg@lists.ut.ee is a comprehensive, national listserve (See Annex 4) reaching Estonian environmental and

Question	Assess. basis*	YES /NO *	Reference to application documents
			conservation organizations.  With consideration of the relative size of Estonia and the evidence provided the Assessor believes this to be in conformance with PEFC requirements.  CONFORMITY
	Process	YES	"Introduction to the Estonian Standard" states, "The consultation process of the draft project of the PEFC Forest management standard for Estonia was held from 02 April 2012, till 02 June 2012. The draft project of the PEFC Forest Management standard for Estonia, together with suggestions submitting form was sent out to the EMSN webpage — www.eramets.ee. At the same time was send out letters about starting the public consultation process."  In minutes dated 02 February 2012 a vote was taken to open the standard for public consultation for a period of 60 days. The minutes indicate the vote was unanimous. In the same minutes discussions included developing a series of open forums to be held in three regions to present the standard to the public and take comments on the standard. (See Annex 5 – WG Minutes 05 February2012)

Question	Assess. basis*	YES /NO *	Reference to application documents
			An email dated 04 April 2012, announces through a list serve the dates, locations and times for the three open forums regarding the draft standard. (See Annex 5 – Announcement of Public Meetings)
			The Assessor believes the evidence in its entirety demonstrates conformance to the standard and an effort to reach disadvantaged and key stakeholders through public fora.  CONFORMITY
c) the enquiry draft is publicly available and accessible,	Procedures	YES	Annex 11, Sec. 7, IN 7.9: "The EMSN shall make an announcement of the public consultation of the standard on its webpage and through the mailing list loodusaeg@lists.ut.ee (See Annex 4). The announcement shall specify:  -The location of the draft standard and its availability to interested parties."  CONFORMITY
	Process		Introduction to Estonian Forest Certification Scheme, Page 5, para 33: "The public consultation process of the draft PEFC Forest management standard for Estonia was held from 20 February to 14 May 2012. During this period, the draft project of the PEFC Forest

Question	Assess. basis*	YES /NO *	Reference to application documents
		YES	management standard for Estonia, together with suggestions submitting form was posted at the EMSN webpage www.eramets.ee and an announcement was sent out to the loodusaeg mailing list about the commencement of the public consultation process." (See Annex 4)  The Assessor is satisfied with this evidence and believes this process to be in conformance to PEFC requirements  CONFORMITY
	Procedures	YES	EST Annex 11, Sec. 7, IN 7.9: "Before Standard is approved by the Board of the EMSN [sic EMSN Board] shall ensure the public consultation process lasting at least for 60 days."  CONFORMITY
d) the public consultation is for at least 60 days,	Process		Introduction to Estonian Forest Certification Scheme, Page 5, para 33: "The public consultation process of the draft PEFC Forest management standard for Estonia was held from 20 February to 14 may 2012. During this period, the draft project of the PEFC Forest management standard for Estonia, together with suggestions submitting form was posted at the EMSN webpage www.eramets.ee and an

Question	Assess. basis*	YES /NO *	Reference to application documents
			announcement was sent out to the loodusaeg mailing list about eh commencement of the public consultation process. (See Annex 4)
		YES	Also, provided as evidence are the following documents:
			- Public invitation to comment dated 14.02.2012 (See Annex 4) - Working Group minutes dated 14 May 2012 reviewing comments and voting to send the standard to the EMSN Board of Directors for approval. (See Annex 4)  The Assessor is satisfied with this evidence and believes this process to be in conformance to PEFC requirements.  CONFORMITY
e) all comments received are considered by the working group/committee in an objective manner,	Procedures	YES	Annex 11, Sect. 7.9: "WG shall summarize the information about public consultation process and performed changes in Standard as result of public consultation."  CONFORMITY
	Process		The EFCS process document "Introduction to Estonian Forest Certification" states, " The suggestions and proposals to the draft PEFC Forest Management standard for

Question	Assess. basis*	YES /NO *	Reference to application documents
		YES	Estonia was submitted from four organizations: Estonia University of Life Sciences, Estonian Nature Protection Society, State Forest Management Centre and Estonian Private Forest Union."  "The Working Group was carried out an analysis on all received remarks, proposals and suggestions." EMSN working group assessed proposals with explanations and sent back to these three (sic. four) organizations, which submitted them.
			CONFORMITY
(f) a synopsis of received comments compiled from material issues, including the results of their consideration,	Procedures	YES	Annex 11 Sec. 7, IN 7.9, para 3: "WG shall summarize the information about public consultation process, including received comments on the Standard and the results of their consideration and make the summary available on the webpage of EMSN."
			CONFORMITY
is publicly available, for example on a website.	Process	NO	Introduction to Estonian Forest Certification Scheme, Page 5, para 4: "The suggestion and proposals to the draft PEFC Forest management standard for Estonia were submitted from four organizations: Estonian University of Life Sciences, Estonian Nature Protection Society, State Forest

Question	Assess. basis*	YES /NO *	Reference to application documents
			Management Centre and Estonian Private Forest Union. The working group was carried out an analysis on all received remarks, proposals and suggestions."
			The procedures document clearly states that four organizations commented on the draft standard, yet no evidence is available to demonstrate that these comments were compiled into a synopsis form.  MINOR NONCONFORMITY
5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.	Procedures	N/A	It was determined that the minor changes to the standard did not warrant pilot testing.
	Process	N/A	Because of the minor changes to the revised scheme the EMNS determined that pilottesting was not necessary.  NOT APPLICABLE
5.8 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus.	Procedures	YES	Annex 11, Sect. 7.6: "Working group has to present to the Board of EMSN projects of the parts of the standard after having found consensus on the content of the documents."  CONFORMITY
	Process		The process document "Introduction to Estonian Forest Certification," page 2. Sect.6; "Working group

Question	Assess. basis*	YES /NO *	Reference to application documents
		presented to the board of EMSN the parts of the standard after having found consensus on the content of the documents.	
		YES	In WG minutes dated 14 May 2012, Section 2 records that approval of the standard was voted upon by a show of hands and that approval to send the standard to the EMNS was unanimous. (See Annex 4)
			CONFORMITY
5.8 In order to reach a consensus the working group/commit to establish whether there is opposition:	ttee can utilise	the follo	owing alternative processes
a) a face-to face meeting where there is a verbal yes/no	Procedures	YES	Annex 11, Sec. 6, IN 6.4, sub-IN 1.: "Decisions in working groups have to be made on basis of consensus. To establish, whether there is opposition, working group uses:  - show of hands in face-to-face meetings;"
vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting			CONFORMITY
voices or hands (votes); a formal balloting process, etc.,	Process	YES	In WG minutes dated 14.05.2012, Section 2 records that approval of the standard was voted upon by a show of hands and that approval to send the standard to the EMNS was unanimous.  CONFORMITY
b) a telephone conference meeting where there is a verbal yes/no vote,	Procedures		EST Annex 11, Sec. 6, IN 6.4, sub-IN 2. : "Decisions in working groups have to be

Question	Assess. basis*	YES /NO *	Reference to application documents
		YES	made on basis of consensus. To establish, whether there is opposition, working group uses:
			<ul><li>verbal yes/no voting method in telephone conferences;"</li><li>CONFORMITY</li></ul>
	Process	N/A	This process was not employed by the WG.
		IV/A	NOT APPLICABLE
c) an e-mail meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote), or	Procedures	YES	Annex 11, Sec. 6, IN 6.4, sub-IN 3.: "Decisions in working groups have to be made on basis of consensus. To establish, whether there is opposition, working group uses: - request for written response for agreement or objection in e-mail meetings."  CONFORMITY
	Process	N/A	This process was not employed by the WG.
d) combinations thereof.	Procedures	YES	Annex 11, Sec. 6, IN 6.4, sub-IN 4.: "Decisions in working groups have to be made on basis of consensus. To establish, whether there is opposition, working group uses:  "Combined methods of decision-making shall not be used by working
a) combinations thereof.	riocedure	25	es YES

Question	Assess. basis*	YES /NO *	Reference to application documents
			CONFORMITY
	Process	N/A	This process was not employed by the WG. Supplemental documentation (minutes) refers to show of hands of those present.
			(See Annex 5– WG Minutes 14 May 2012 )
5.9 In the case of a negative vote which represents sustained concerned interests surrounding a substantive issue, the issumechanism(s):			•
a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,	Procedures	YES	Annex 11, Sect.7.6: "This also means that the working group follows working methods that support the emergence of mutual understanding between the members of the working group."  CONFORMITY
	Process	N/A	No evidence of disputes noted in WG minutes.  NOT APPLICABLE
b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,	Procedures	YES	Annex 11, Sect.7.6: "This also means that the working group follows working methods that support the emergence of mutual understanding between the members of the working group."  CONFORMITY
	Process	N/A	No evidence of disputes noted in WG minutes.  NOT APPLICABLE

Question	Assess. basis*	YES /NO *	Reference to application documents
Procedures c) dispute resolution process.			Annex 11, Sect. 7.6: "If consensus is not reached, the issue is handled by the Panel as regulated in chapter 8."
			Annex 11, Sect. 8: "Disagreements on the contents of the standards as well as appeals on the activities and procedures of the working groups are considered by a Panel that has a chairman and two members.
	YES	The EMSN appoints an impartial chairman to the Panel. The parties in dispute appoint, case by case, one member in the Panel.	
			The Panel gives its decision in writing. The decision includes a short description of the matter, justification and outcome of the Panel. The Panel informs the working group and EMSN about its decision. The decision is final."
	Process	N/A	No evidence of disputes noted in WG minutes.  NOT APPLICABLE
5.10 Documentation on the implementation of the standard-setting process shall be made publicly available.	Procedures	YES	Annex 11 Sect. 4 states, the EMSN "is the legal body established for the promotion of the implementation of principles of sustainable forestry in Estonian forests by developing the forest certification model suitable

Question	Assess. basis*	YES /NO *	Reference to application documents
			for Estonian conditions and shall be responsible for co- ordination of standard setting process."
			Annex 11, sect. 7.4: "All meetings have to be documented and minutes of the meeting shall be sent to the EMSN who shall make them available for all interested parties."
			The Assessor finds this to be in conformance with PEFC requirements.  CONFORMITY
	Process	YES	The process document, "Introduction to the Estonian Forest Certification Scheme" states, "All the Estonian forest certification documentation is available in Estonian Forest Certification Council web page www.eramets.ee  All the documentation no longer appears on the website, but the Assessor was able to obtain copies of minutes, correspondence, etc. by contacting PEFC Estonia which functions as record repository of the EMSN.  (See Annex 4 for examples)  CONFORMITY
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	Procedures	YES	EST Annex 11, Sec. 7, IN 7.6: "Working group has to present to the Board of EMSN projects of the parts of the standard after having found consensus on

Question	Assess. basis*	YES /NO *	Reference to application documents
			the content of the documents."
			EST Annex 11, Sec. 7, IN 7.7: "All documents of the Estonian forest certification scheme have to be approved by the board of EMSN." CONFORMITY
	Process	YES	The process document, "Introduction to the Estonian Forest Certification Scheme" described the following: "6. Working group presented to the board of EMSN the parts of the standard after having found consensus on the content of the documents."  CONFORMITY
	Procedures	YES	Annex 11, Sec. 7, IN 7.9, para. 4: "Approved standards / normative documents will be published not later than 4 weeks after approval on the homepage of EMSN."  CONFORMITY
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	Process	YES	The process document, "Introduction to the Estonian Forest Certification Scheme" states, "All the Estonian forest certification documentation is available in Estonian Forest Certification Council web page " (See Annex 4 for documentation)

Question	Assess. basis*	YES /NO *	Reference to application documents
			CONFORMITY
Revisions of standards/nor	mative docum	ents	
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	Process	YES	EST Annex 11, Standard Setting processes between 2009 - 2012.
in chapter 5.			CONFORMITY
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	Process	YES	EST Annex 11, Standard Setting Procedures 2012.  CONFORMITY
6.3 The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training.	Process	YES	EST Annex 11 Standard Setting Procedures 2012 CONFORMITY
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.	Process	YES	EST Annex 11, Standard Setting Procedures 2012 CONFORMITY

# 3 Application documentation

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

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

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

For "Procedures" the applicant should refer to the part(s) of its standard setting procedures related to the respective PEFC requirement. For "Process" the applicant should either refer to the report/records of the standard setting

process forming a part of the submitted application documents, or describe how the PEFC requirement was fulfilled during the standard setting process.

YES/NO\*

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



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

#### 1 Scope

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

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

## 2 Checklist

Question	YES / NO*	Reference to system documentation
General		
4.1 Does the forest certification scheme provide clear definition with the definitions of those terms presented in chapter 3 of F		•
a) the group organisation,	YES	PEFC EST 2: "not-for-profit association or commercial cooperative founded by forest owners and which represents the woodland owners in the certification process."  CONFORMITY
b) the group entity,	YES	PEFC EST 2, Section 4, "Definition of Terms:" defines the term "group entity" as the following:  "An entity that represents the participants, with overall responsibility for the ensuring the conformity of forest management in the certified area to the sustainable forest management standard and other applicable requirements of the forest certification scheme."

Question	YES / NO*	Reference to system documentation
		CONFORMITY
c) the participant,	YES	PEFC EST 2 states," If the model of group certification is applied, the forest owners participate in the process through the organization regardless of the location of the property." In the Estonian group certification system, the forest owner is the participant."
		The Assessor finds this to be in conformance with the PEFC definition.
		CONFORMITY
d) the certified area,	YES	The Assessor cannot find a clear definition of the term "certified area" in the forest certification scheme documentation the Assessor believes that the preponderance of evidence demonstrated throughout PEFC EST clearly show that the certified area is the forested area under PEFC certificate either managed by an individual, a forest manager or a group entity as defined in PEFC EST 2. The Assessor believes that this evidence in its entirety demonstrates conformance to the PEFC standard requirements.
e) the group forest certificate, and	YES	PEFC EST 2, Sect. 5.2.1; "The certificate will be issued to the organization (applicant); the forest owner participating in the process receives confirmation about the certificate."  CONFORMITY
f) the document confirming participation in group forest certification.	YES	PEFC EST 2, Sect. 5.2.1; "The certificate will be issued to the organization (applicant); the forest owner participating in the process receives confirmation about the certificate."

Question	YES / NO*	Reference to system documentation
		CONFORMITY
4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner.	YES	PEFC EST 2, Sec. 6.2 states," Forest owners are not allowed to have more than one valid PEFC forest management certificate per forest property."  CONFORMITY
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.	YES	The Procedure Requirements for the Certification of Forest Management and Chain of Custody, hereafter referred to as PEFC EST 2, defines the group organization as 1) "not-for-profit association or commercial cooperative founded by forest owners and which represents the woodland owners in the certification process;"  PEFC EST 2, Sect. 6.1.1.3: "Concludes the contracts with all forest owners participating in the certification process. The forest owner takes responsibility to carry out duties as stipulated in National Forest Standard."  Sect. 6.1.1.5: "Assists the forest owners in the compiling of Sustainable Forest Management Plan" "The organization also represents forest owner in relation with the compiler of the management plan."  Sect. 6.1.1.6: "Provides the information and training to the forest owners for the fulfilment of the certification requirements."  Sect. 6.1.1.8: "Administrates the database, which shows what the forests that are embraced with certificates and issues the confirmation on the existence of certificate to the forest owner who has participated in the

Question	YES / NO*	Reference to system documentation	
		certification process."  Sect. 6.1.1.8: "Carries out internal audit of following the requirements of National Forest Standard by controlling the recognition of requirements of sustainable forest management (the Standard) in concrete forest holdings, which have been chosen by using the sampling method."  CONFORMITY	
4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.	YES	PEFC EST 2 Sect. 6.1.1.11 calls for the Group Entity to carry out an internal audit using the following procedure and process.  "The sampling method is defined as a process of selecting forest holdings for the purposes of conducting internal audits to verify compliance with the National Forest Standard and other applicable requirements. The sample shall represent:  a. No less than 1 forest holding in case the total number of certified holdings in the group is 5 or less.  b. No less than 2 forest holdings in case the total number of certified holdings in the group is from 6 – 20.  c. No less than 5 forest holding in case the total number of certified holdings in the group exceeds 20 of the total"  The Assessor believes the standard to be in conformance with PEFC requirements.  CONFORMITY	
Functions and responsibilities of the group entity			

Question	YES / NO*	Reference to system documentation			
4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:					
		PEFC EST 2, 6.1.1.3; "Concludes all contracts with forest owners participating in the forest certification process."			
a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the	YES	Sect. 6.1.1.4: "Represents those forest owners who have submitted an application for the certification in their relations with the certification body,"			
certification body;		Sect. 8.1.1: "The application for the group certification has to be signed by an authorised agent of the organisation."			
		CONFORMITY			
b) To provide a commitment on behalf of the whole group organisation to comply with the sustainable forest	YES	PEFC EST 2, Sect. 7.1.1: "In the case of forest certification, an agreement on forest certification between the organisation and the forest ownershall contain the following"			
management standard and other applicable requirements of the forest certification scheme;	11.5	Sect 7.1.1: "forest owners' duty to comply with Estonian legislation important for forestry and National Forest Standard."			
		CONFORMITY			
c) To establish written procedures for the management of the group organisation;	YES	PEFC EST 2, Sec. 6.1.1, clearly establishes the duties of the Group Entity. Sec. 6.1.1.1 – 12 gives specific procedures to be followed by the Group Entity. Although there is no clear stated requirement calling for the establishment of written procedures, the preponderance of evidence leads this Assessor to consider this to be in conformance with PEFC Standard requirement 4.2.1 c.			
		CONFORMITY			

Question	YES / NO*	Reference to system documentation
		PEFC EST 6.1.1: "The organization:"
d) To keep records of:		Sect 6.1.1.8: "Administrates the database, which shows what forests that are embraced with the certificates and issues the confirmations on the existence of the certificate to the forest owner who has participated in the certification process.
- the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the		The database of certified forests has to contain at least the following information:
forest certification scheme, - all participants, including their contact details,		-the name of the forest owner and his/her contact information;"
identification of their forest property and its/their size(s),	YES	-the date of the conclusion of the contract;
- the certified area,		-the area of forestland;
- the implementation of an internal monitoring programme, its review and any preventive and/or		-the number of the forest holding and cadastral code."
corrective actions taken;		Sect 6.1.1.9: "Informs and advises those forest owners, who have not complied with all demands of the (Standard) and give concrete advises/regulations for following the standards' requirements."
		Sect. 6.1.1.11: "Carries out an internal audit following the requirements of the National Forest Standard"
		CONFORMITY
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	YES	PEFC EST 2; IN 7.1; "In the case of group certification, an agreement on forest certification between the organization and the forest owner with the validity period of at least 5 years will be concluded. The agreement shall contain at least the following responsibilities":
certification in the event of non-conformity with the sustainable forest management standard;		Sect. 7.1.1; "forest owners' duty to comply with Estonian legislation important for forestry and

Question	YES / NO*	Reference to system documentation
		National Forest Standard [sic EFCS]."  CONFORMITY
f) To provide participants with a document confirming participation in the group forest certification;	YES	PEFC EST 2; Sect. 7.1.12; "The organization "Issues a confirmation note to the forest owners about the existence of the certificate to the forest owners."  CONFORMITY
g) To provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	PEFC EST 2; Sect. 6.1.6; "Provides the information and training to the forest owners for the fulfilment of the certification requirements."  Sect. 6.1.7; "Informs the forest owners about the requirements of PEFC related to the timber selling transactions."  CONFORMITY
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;	YES	PEFC EST 2; Sect. 6.1.11; "Carries out an internal audit on following the requirement of National Forest Standard (EFCS) by controlling the recognition of requirements of sustainable forest management (standard) in the concrete forest holdings which have been chosen by the sampling method."  CONFORMITY
i) To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.	Yes	PEFC EST 2; Sect. 6.1.1.9; "Informs and advises those forest owners, who have not complied with all demands of the [EFCS] and gives concrete advises/regulations for following the standards' requirements. The organization has to inform the certification body about the deficiencies, if non conformity of existing regulations appears."  Sect.6.1.1.10; "Informs EMSN about the number of forest owners and the area of forests embraced

Question	YES / NO*	Reference to system documentation
		by the certificate; and announces the EMSN about the results of the accomplished audits; and informs EMSN constantly about the cancellations of the confirmations of the certificates and about the issuance of the new confirmations."  Sect 6.1.1.11; "In regard to findings during the internal audit"The discovered shortages will be documented; the forest owner will be informed about them and practical guidelines will be given to the forest owner by the organization in order to achieve better compliance with requirements of the standard. The certification body shall be informed if the given recommendations will not be followed."  CONFORMITY
Function and responsibilities of	f particip	pants
4.3.1 The forest certification scheme shall define the following	g requirer	ments for the participants:
a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	PEFC EST 2; IN 7.1; "In the case of group certification, an agreement on forest certification between the organization and the forest owner with the validity period of at least 5 years will be concluded. The agreement shall contain at least the following responsibilities":  Sect. 7.1.1; "forest owners' duty to comply with Estonian legislation important for forestry and National Forest Standard [sic EFCS]."  CONFORMITY
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	YES	PEFC EST 2; Sect. 7.1.1; "forest owners' duty to comply with Estonian legislation important for forestry and National Forest

Question	YES / NO*	Reference to system documentation
		Standard [sic EFCS]."  CONFORMITY
c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise;	YES	PEFC EST 2; Sect 7.1.3; "forest owners' acceptance to checking of the compatibility of the forest management with the National Forest Standard (EFCS) both by the organization and the certification body;"  CONFORMITY
d) To implement relevant corrective and preventive actions established by the group entity.	YES	PEFC EST 2;Sect 7.1.1; ""forest owners' duty to comply with Estonian legislation important for forestry and National Forest Standard [sic EFCS]. This includes obligation to correct the mistakes and deficiencies, if nonconformities have been indicated by the certification body or the organization;"  CONFORMITY



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

## 5 **Scope**

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

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

#### 2 Checklist

Question	YES / NO*	Reference to scheme documentation
General requirements for SF	M standa	rds
4.1 The requirements for sustainable forest management defi forest management standards shall	ned by re	gional, national or sub-national
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.	YES	The PEFC National Forest Standard for Estonia clearly and precisely defines requirements for forest management at the certified group and individual forest owner level. Additionally it addresses requirements for forests exceeding 10,000 hectares.  Forest management planning is a function of the forest owner and/or forest manager. PEFC National Forest Standard for Estonia (EST SFMS) defines the following.  "Large Scale Forest Manager — with forest area exceeding 10,000

Question	YES / NO*	Reference to scheme documentation
		ha."  "Forest Manager – forest owner or person holding forest management rights."  CONFORMITY
b) be clear, objective-based and auditable.	Yes	The assessor finds the PEFC National Forest Standard for Estonia to be clear, objective- based and auditable.  Assessors Note: Translation issues and poor English grammar are prevalent throughout the document.  CONFORMITY
c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.	YES	EST SFMS Cr. 19, IN 19.2:  "Contracts made by FOREST MANAGER with employees shall include obligation to comply with the requirements of this standard and the forest manager shall monitor compliance with the requirements."  CONFORMITY
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.	YES	EST SFMS Cr. 19, IN 19.2: "Documents giving evidence of the compliance of forest management with the requirements of the standard shall be preserved."  CONFORMITY
Specific requirements for SF		
Criterion 1: Maintenance and appropriate enhancement of for global carbon cycle	orest reso	ources and their contribution to the
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	YES	CR 1, IN 1.1: "Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of

Question	YES / NO*	Reference to scheme documentation
done by making full use of related services and tools that support land-use planning and nature conservation.		the economic, ecological, cultural and social values of forest resources, including soil and water."
		CR 1, IN 1.2: "Forest management plan or information related to it shall include:"
		CR 1, IN 1.2.1 – 1.2.6.3, call for the providing the following:
		- forest inventory data'
		<ul> <li>total area of young growths, natural regeneration, and open canopy forest plantations,</li> </ul>
		- nature conservation restrictions
		- estimates of thevolume of forestry works for at least 10 years
		CONFORMITY
5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and		CR 1, IN 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."
evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.	YES	CR 1, IN 1.2.: "Forest management plan or information related to it shall include":
		CR1, IN 1.2.2: "Forest inventory not older than 10 years";
		CR 1, IN 1.2.3: "Nature conservation restrictions and other restrictions to forest management";
		CR 1, In 1.2.4: "Estimates and

Question	YES / NO*	Reference to scheme documentation
		general plan of the volume of forestry works for at least 10 years";
		CR 3, IN 3.1," FOREST MANAGER shall implement a monitoring system to monitor, at least:"
		CR 4 "Forest managers shall ensure the preservation of objects protected under heritage and nature conservation and objects of cultural value."
		Additional indicators include IN 4.4, 4.2, 4.3, 4.5.
		CONFORMITY
		CR 1, IN 1.2.: "Forest management plan or information related to it shall include":
		IN 1.2.1: "Forest inventory data not older than 10 years."
		In 1.2.4: "Estimates and general plan of the volume of forestry works for at least 10 years"
		IN 1.2.5: "Map of forest stand;"
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.	YES	IN 4.1: "FOREST MANAGERS know the location of objects of natural or cultural value in certified land. They are able to show them either on site or the objects have been entered in GIS."
		Additional indicators include: IN 1.2.6.1,
		IN 4.3: "If objects of potential protection value are discovered, the relevant state agency shall be notified"
		IN 4.5: "LARGE-SCALE FOREST MANAGER shall continuously update information about the

Question	YES / NO*	Reference to scheme documentation
		registered protected areas in their lands. The national database (EELIS) is updated once a week and LARGE-SCALE FOREST MANAGER should always keep their data updated."  IN 5.3: "FOREST MANAGER is able to show the protected parts of the forest either on site or the objects have been entered in GIS."  CONFORMITY
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.	NO	CR 1, IN 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."  CR 1, IN 1.2: "Forest management plan or information related to it shall include:"  CR 1, IN 1.2.1 – 1.2.6.3, call for the providing the following:  - total area of young growths, natural regeneration, and open canopy forest plantations,  - nature conservation restrictions  - estimates of thevolume of forestry works for at least 10 years  CR 19: "Forest management shall comply with all laws and regulations and the requirements of the standard."  Further, page 1, paragraph 3, of

Question	YES / NO*	Reference to scheme documentation
		the Introduction of the Estonian Forest Certification Scheme states, "The aim of the association [sic, EMSN] is to promote the application of principals of sustainable forestry in Estonian forest by developing the forest certification model suitable for Estonian conditions and being in accordance with requirements of PEFC."  IN 15.2: "Forest management shall take into account the comprehensive plans and thematic plans of local governments and the resulting restrictions."
		MINOR NONCONFORMITY
	YES	CR 1.2: "Forest management plan or information related to it shall include:
		IN 1.2.2: "Forest inventory data not older than 10 years;"
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.		IN 1.2.4: "Estimates and general plan of the volume of forestry works for a t least 10 years starting with the compiling of the plan;"
		IN 1.2.6.1: "The forecast of the composition and the growing stock of the forest for at least 10
		IN 2.2: "Objectives of forest use shall be specified in the forest management plan or another document. Objectives of forest use shall be generally established in the course of preparing the forest management plan."
		CR 7: Forest management shall maintain the productivity of forests.

Question	YES / NO*	Reference to scheme documentation
		IN 7.1: "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."
		The Assessor believes that taken in its entirety this is in conformance with PEFC requirements.
		CONFORMTIY
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	YES	IN 2.3: "Objectives of forest use, estimate of forestry works and the general plan are available for interested persons."
confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.		CONFORMITY
		CR 1.2: "Forest management plan or information related to it shall include:"
	YES	IN 1.2.1; "Forest inventory data not older than 10 years;"
5.1.7 Monitoring of forest resources and evaluation of their		1.2.4' "Estimates and general plan of the volume of forestry works for at least 10 years"
management shall be periodically performed, and results fed back into the planning process.		IN 3.1: "FOREST MANAGER shall implement a monitoring system to monitor, at least:"
		IN 3.1.1: "The condition of forests and damage to forests"
		IN 3.4: "Forest monitoring shall give feedback to the forest management plan."
		CONFORMITY
5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	CR 19, IN 19.1: "FOREST MANAGER shall comply with all

Question	YES / NO*	Reference to scheme documentation
		applicable laws."  IN 19.2: "Contracts made by FOREST MANAGER with employees shall include the obligation to comply with the requirements of this standard and the forest manager shall monitor compliance with the requirements."  CONFORMITY
		IN 1.2: "Forest management plan or information related to it shall include:"
5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.	YES	IN 1.2.6.1: "The forecast of the composition and the growing stock of the forest for at least 10 years"
		CR 7: Forest management shall maintain the productivity of forests.
		IN 7.1: "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."
		IN 7.2: "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"
		CR 11: "Maintenance cutting shall ensure the good condition of the remaining forest."
		IN 11.2: "In the course of maintenance cutting, damaging the forest soil shall be avoided."
		CR 12: Regeneration cutting shall avoid causing damage to the

Question	YES / NO*	Reference to scheme documentation
		environment.  IN 12.3: "Causing damage to forest soil shall be avoided during regeneration cutting."  CONFORMITY
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.	YES	IN 1.2: "Forest management plan or information related to it shall include:"  IN 1.2.6.1: "The forecast of the composition and the growing stock of the forest for at least 10 years"  CR 10: "Forest management shall ensure high-quality regeneration."  IN 10.1: "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 resource."  IN 10.2: "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 locals provenances have been evaluated, and if negative impacts can be avoided or minimised."  IN 10.3: "Regeneration shall be monitored and damages shall be reported to the relevant government agencies."  IN 10.4: "Genetically-modified

	Question	YES / NO*	Reference to scheme documentation
			trees shall not be used in the forest."  CONFORMITY
incl sha	.11 Conversion of forests to other types of land use, luding conversion of primary forests to forest plantations, ill not occur unless in justified circumstances where the oversion:  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 entails a small proportion of forest type; and 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 makes a contribution to long-term conservation, economic, and social benefits.	YES	CR 2, IN 2.4: "Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:  a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations; and b) entails a small proportion of forest type; and c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and d) makes a contribution to long-term conservation, economic, and social benefits. Additionally, land conversion is regulated by the national planning
			act (https://www.riigiteataja.ee/akt/1 13032014097), where it is

Question	YES / NO*	Reference to scheme documentation
		stipulated that planning process is open to public, it must involve consultation with all stakeholders who might be affected by the planning process outcome."  CONFORMITY  Additional information provided
5.1.12 Conversion of abandoned agricultural and treeless land into forest land shall be taken into consideration, whenever it can add economic, ecological, social and/or cultural value.	YES	(Copy of EST PEFC Review of NCRs 5July12) by EMSN demonstrates that land conversion is regulated by the national planning act (https://www.riigiteataja.ee/akt/1 13032014097), where it is stipulated that planning process is open to public, it must involve consultation with all stakeholders who might be affected by the planning process outcome."  The Assessor finds this evidence to be sufficient to declare this to be conformance with PEFC requirements.  CONFORMITY
5.2.1 Forest management planning shall aim to maintain and increase the health and vitality of forest ecosystems and to rehabilitate degraded forest ecosystems, whenever this is possible by silvicultural means.	YES	CR 13: Land improvement in the forest shall be carefully planned.  IN 13.1: "In managed forest suffering from excess humidity, new land improvement systems shall be constructed in justified cases;"  IN 13.2: "If new systems are constructed in an area of more than 100 hectares, environmental impact assessment shall be conducted."  IN 13.3: "Existing land

Question	YES / NO*	Reference to scheme documentation
		improvement systems shall be maintained in good working order."
		IN 13.4: "Maintenance, renovation and reconstruction of land improvement systems shall proceed from valid legislation."
		CONFORMITY
Criterion 2: Maintenance of forest ecosystem health and vita	lity	
		CR 3.1: FOREST MANAGER shall implement a monitoring system to monitor, at least:
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.		IN 3.1.1: "The condition of the forest and damage to the forests;"
	YES	IN 3.2.1 "The quantity of non- wood forest products collect for sale (Christmas trees, seeds, seedlings, wild game);"
		IN 3.2.4 "Damage caused to forest soil and roads in the course of forestry works."
		Taken in their entirety the Assessor determines this standard to be in conformance.
		CONFORMITY
5.2.3 The monitoring and maintaining of health and vitality of forest ecosystems shall take into consideration the effects of naturally occurring fire, pests and other disturbances.	YES	CR 3.1: FOREST MANAGER shall implement a monitoring system to monitor, at least:
		IN 3.1.1: "The condition of the forest and damage to the forests;"
		IN 3.2.1 "The quantity of non- wood forest products collect for sale (Christmas trees, seeds, seedlings, wild game);"
		IN 3.2.4 "Damage caused to forest soil and roads in the course of forestry works."

Question	YES / NO*	Reference to scheme documentation
		Taken in their entirety the Assessor determines this standard to be in conformance.
		CONFORMITY
5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.	YES	IN 5.1: "Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation and of damages to forest ecosystems. Forest management shall make use of strategic instruments set up to support these activities."
		CONFORMITY
		CR 7: Forest management shall maintain the productivity of forests.
		IN 7.1: "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."
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	YES	IN 7.2: "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"
stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.		IN 7.3: "For regeneration of harvested parts of the forest, the tree species suitable to the habitat and the objectives of the forest manager shall be taken into consideration, provided that the sustainable productive capacity of forests is not significantly reduced."
		In 11.5: "Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures

Question	YES / NO*	Reference to scheme documentation
		such as uneven-aged stands and the diversity of species such as mixed stands."
		IN 12.4: "Structural elements necessary in terms of biological diversity (standing dead trees and down timber, retention trees, etc.) shall be retained during regeneration cutting."
		IN 12.5 "In regeneration cutting, the specific features of the landscape shall be taken into consideration"
		CONFORMITY
		Additional information (Copy of EST PEFC Review of NCRs 5 July12) provided by EMSN states "
5.2.6 Lighting of fires shall be avoided and is only permitted if it is necessary for the achievement of the management goals of the forest management unit.	YES	Lighting of fires is regulated by the forest act (https://www.riigiteataja.ee/akt/1 04032015010?leiaKehtiv) where is stipulated that lighting of forest fires is permitted only in designated places and or with the permission of the landowner (§35 section 1 para 2)  The Assessor finds this evidence to be sufficient to declare this to be
		in conformance with PEFC requirements.  CONFORMITY
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	YES	IN 3.1: "Forest manager shall implement a monitoring system to monitor,"
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	11.3	IN3.2.2: "Littering in forests."  CR 10.2: "For reforestation and afforestation, origins of native

Question	YES / NO*	Reference to scheme documentation
strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.		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 locals provenances have been evaluated, and if negative impacts can be avoided or minimised."
		CR 11.2: "In the course of maintenance cutting, damaging the forest soil shall be avoided."
		CR 12 .3: "Causing damage to forest soil shall be avoided during regeneration cutting."
		CR5, IN 5.6: "Disposal of waste on forest land shall be strictly avoided during forest management activities."
		IN 5.6.1: "The spillage of oil during forest management operations shall be avoided. Machinery shall be supplied with oil spill clean-up kit."
		Additionally provided evidence by PEFC EST (Copy of EST PEFC Review of NCRs 5July12) states that handling of waste is regulated by the waste act (https://www.riigiteataja.ee/akt/1 14062013006?leiaKehtiv) and it covers handling different types of waste, including solid and liquid organic and non-organic waste. The forest act states that littering is forbidden in the forest and the act defines punitive sanctions for such actions (§ 67 (1) 6), §67 (8) 1).

Question	YES / NO*	Reference to scheme documentation
		CONFORMITY
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	YES	Additionally provided evidence by PEFC EST (Copy of EST PEFC Review of NCRs 5July12) states that The Forest Act stipulates that the use of pesticides is permitted only in cases where it is warranted by the forest pathological expert to contain the mass spread of insects or pests in the forest. In normal forestry practices, the use of pesticides is forbidden, see (https://www.riigiteataja.ee/akt/1 26022014017)  CR 6, IN 6.5: "For protection against pest shall be preferred appropriate silvicultural techniques and natural resources."  CONFORMITY
5.2.9 The WHO Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available.	YES	IN 6.1: "The World Health Organization (WHO) Type 1A and 1B pesticides and other highly toxic pesticides shall be prohibited."  Additionally provided evidence by PEFC EST (Copy of EST PEFC Review of NCRs 5July12) states that The Forest Act stipulates that the use of pesticides is permitted only in cases where it is warranted by the forest pathological expert to contain the mass spread of insects or pests in the forest. In normal forestry practices, the use of pesticides is forbidden, see (https://www.riigiteataja.ee/akt/1 26022014017) The Assessor finds this to be in conformance with PEFC

Question	YES / NO*	Reference to scheme documentation	
		requirements.	
		CONFORMITY	
5.2.10 Pesticides, such as chlorinated hydrocarbons whose derivates remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.	YES	IN 6.2: "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." The Assessor notes that IN 6.2 defines "pesticides banned by international agreement" as those presented in the Stockholm Convention on Persistent Organic Pollutants 2001, as amended.  CONFORMITY	
5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	YES	IN 6.3: "The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training."  CONFORMITY	
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	YES	IN 6.4: "Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment."  CONFORMITY	
Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)			
5.3.1 Forest management planning shall aim to maintain the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis.	YES	IN 7.1: "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."  CONFORMITY	

Question	YES / NO*	Reference to scheme documentation
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	CR 7, IN 7.4: "Forest management planning shall aim to achieve sound economic performance taking into account any available market studies."  The Assessor finds this to be in conformance with PEFC requirements.  CONFORMITY
5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.	YES	IN 7.1: "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."  Although the assessor can find no specific reference to forest management planning making use of policy instruments which support the production of commercial and non-commercial forest goods and services, the preponderance of supplemental evidence provided by PEFC Estonia leads the Assessor to the conclusion that such national policy instruments are in place and available for management plan use.  With this in mind the Assessor finds this to be conformance with PEFC requirements.  CONFORMITY
5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.	YES	IN 7.1: "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."  IN 8.1: "If FOREST MANAGER also

Question	YES / NO*	Reference to scheme documentation
		manages non-wood resources, the industry potential of these resources shall be ascertained."
		IN 8.2: "In the case of industrial exploitation of by-products, also plan concerning the use of the by-products of the forest, conform to the forest management plan, shall be presented in the annex of the forest management plan."  IN 8.3: "The methods of use of by-
		products of the forest must not in the long term deteriorate the condition of forest and significantly decrease its productive capacity (both in timber production and non-wood forest use.)"
		The Assessor determines that taken in their entirety, the indicators prove conformance to the PEFC Standard.
		CONFORMITY
5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.	YES	IN 7.2: "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."
		CONFORMITY
5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the		IN 3.1: "Forest Manager shall implement a monitoring system to monitor"
long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.	YES	IN 3.1.2: "Quantity of harvested timber, area of harvesting and reforested area;"
		IN 3.2.1: "The quantity of non-

Question	YES / NO*	Reference to scheme documentation
		wood forest products collected for sale"
		IN 8.1: "If FOREST MANAGER also manages non-wood resources, the industrial potential of these resources shall be ascertained."
		IN 8.2" In the case of industrial exploitation of by-products, also plan concerning the use of the by-products of the forest, conforming to the forest management plan, shall be presented in the annex to the forest management plan."
		IN 8.3: "The methods of use of by- products of the forest must not in the long term deteriorate the condition of forest and significantly decrease its productive capacity (both in wood and non-wood forest use.)"
		CONFORMITY
		IN 3.1: "Forest Manager shall implement a monitoring system to monitor"
		IN 3.2.1: "The quantity of non- wood forest products collected for sale (Christmas trees, seeds, seedlings, wild game)."
5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.	YES	IN 8.1: "If FOREST MANAGER also manages non-wood resources, the industrial potential of these resources shall be ascertained."
		IN 8.2" In the case of industrial exploitation of by-products, also plan concerning the use of the by-products of the forest, conforming to the forest management plan, shall be presented in the annex to the forest management plan."
		IN 8.3: "The methods of use of by-

Question	YES / NO*	Reference to scheme documentation	
		products of the forest must not in the long term deteriorate the condition of forest and significantly decrease its productive capacity(both in wood and non-wood forest use.)"	
		CONFORMITY	
		CR 1.2: "Forest management plan or information related to it shall include:"	
		CR 1.2.6.2: "Map of road network and ditches;"	
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.	YES	CR 1.2.6.3" "Estimate on the condition of roads and the need for building new roads."	
		CR 14.1: "Damaging the road upon transport of timber shall be avoided, but if damage occurs, he damaged roads shall be repaired."	
		The Assessor determines that these indicators, considered in their entirety demonstrate conformance to the PEFC Standard.	
		CONFORMITY	
Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems			
5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.	YES	IN 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."	
		CR 1, IN 1.2: "Forest management plan or information related to it shall include:"	

	Question	YES / NO*	Reference to scheme documentation
			CR 1, IN 1.2.1 – 1.2.6.3, call for the providing the following:
			- forest inventory data'
			<ul> <li>total area of young growths, natural regeneration, and open canopy forest plantations,</li> </ul>
			- nature conservation restrictions
			- estimates of thevolume of forestry works for at least 10 years
			CR 4 "Forest managers shall ensure the preservation of objects protected under heritage and nature conservation and objects of cultural value."
			Additional indicators include IN 4.1, 4.2, 4.3, 4.5.
			CONFORMITY
of for	2 Forest management planning, inventory and mapping orest resources shall identify, protect and/or conserve logically important forest areas containing significant centrations of:		IN 4.1: "FOREST MANAGERS know the location of objects of natural or cultural value in certified land. They are able to show them either on site or the objects have been entered in GIS."
a)	protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;		IN 4.2: "Forest management shall not deteriorate the condition of known objects of nature and
b)	areas containing endemic species and habitats of threatened species, as defined in recognised reference		heritage conservation and other objects of cultural value."
	lists;	YES	IN 4.3: "If objects of potential protection value are discovered,
c) and	endangered or protected genetic <i>in situ</i> resources; taking into account	ILJ	the relevant state agency shall be notified"
d)	globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.		IN 4.5: "LARGE-SCALE FOREST MANAGER shall continuously update information about the registered protected areas in their

Question	YES / NO*	Reference to scheme documentation
		lands. The national database (EELIS) is updated once a week and LARGE-SCALE FOREST
		MANAGER should always keep their data updated."
		IN 5.1: "Forest management plans or their equivalents shall specify ways and means to minimise risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of strategic instruments set up to support these activities."
		IN 5.2: "During forest management, FOREST MANAGER shall preserve the parts of forest that are protected pursuant to law."
		IN 5.3: "FOREST MANAGER is able to show the protected parts of the forest either on site or the objects have been entered in GIS."
		CONFORMITY
5.4.3 Protected and endangered plant and animal species shall not be exploited for commercial purposes. Where	VEC	IN 5.2: "During forest management, FOREST MANAGER shall preserve the parts of forest that are protected pursuant to law."
necessary, measures shall be taken for their protection and, where relevant, to increase their population.	YES	IN 5.3: "FOREST MANAGER is able to show the protected parts of the forest either on site or the objects have been entered in GIS."
		CONFORMITY
5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.	YES	IN 10.1: "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

Question	YES / NO*	Reference to scheme documentation
		resource."  CONFORMITY
5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.	YES	CR 10.2: "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 locals provenances have been evaluated, and if negative impacts can be avoided or minimised."  CONFORMITY
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	Although PEFC EST SFM does define "Ecological Network" as "such position of detached plots of forest land or their connection with ecological corridors that guarantee interaction between the populations of species for the survival of the species," the standard does not address the promotion of improving and restoring the ecological connectivity of the forest.  Additionally provided evidence by PEFC EST (Copy of EST PEFC Review of NCRs 5 July 2012) states that ecological connectivity within the forest landscape is required by different legal acts, such as forest act which restricts clearcuts in adjacent areas before the initial clearcut is successfully reforested Forest Act §29 (9). The nature conservation act (https://www.riigiteataja.ee/akt/L KS) requires conservation of

Question	YES / NO*	Reference to scheme documentation
		coastal and riparian zones along watercourses. The width of buffer zones is defined by the catchment area (§37). Clearcuts are prohibited in the coastal and riparian zones. For preservation of biological diversity in felling sites there are specific requirements in the forest act. Deadwood, snags, retention trees, viable undergrowth must be preserved in the course of felling operations. Furthermore, 10 percent of the national forest area is strictly protected and 15 percent is with management restrictions where clearcuts are prohibited. Such areas form a nationwide network of protected areas (Yearbook of forests http://www.energiatalgud.ee/ind ex.php?title=Pilt:Keskkonnaagentu urMets_2013Aastaraamat_2014.pdf)  The Assessor believes this preponderance of evidence overwhelming demonstrates this to be in conformance with PEFC requirements.
5.4.7 Genetically-modified trees shall not be used.	YES	IN 10.4: "Genetically modified trees shall not be used."  CONFORMITY
5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.	YES	IN 11.5: "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."  CONFORMITY

Question	YES / NO*	Reference to scheme documentation
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	N/A	Additionally provided evidence by PEFC EST (Copy of EST PEFC Review of NCRs 5July12) states, "It is suggested to regard coppicing as not applicable, because it has not been a tradition in Estonia. The traditional management system could be for instance wooded meadow or wooded pasture. Such areas however are not economically feasible and are maintained by landowners because the EU is providing subsidies to enhance the ecological value of such habitats. And it is limited to protected areas (Natura 2000 sites) where it is strictly regulated by nature conservation act. Thus the traditional management methods would include selective harvesting and continuous cover forestry, which are practiced by small-scale landowners. Such methods are, however, covered by legislation and need no further elaboration in the national standard."  NOT APPLICABLE
5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to improve or maintain biological diversity.	YES	IN 7.1: ""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."  IN 7.2: "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

Question	YES / NO*	Reference to scheme documentation
		appropriate systems."  CONFORMITY
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.	YES	IN 14.4: "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."  CONFORMITY
		CR 5, IN 5.5: "FOREST MANAGER shall organize management of game population to minimise damages by game."
5.4.12 With due regard to management objectives, measures shall be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity.	YES	Additionally provided evidence (Copy of EST PEFC Review of NCRs 5July12) states, "The measures to control animal grazing in the forest is regulated by the Hunting Act (https://www.riigiteataja.ee/akt/JahiS). Forest owner and local hunting association agree mutually that the association can use the forest for hunting and that the hunters oblige to keep the grazing pressure under control. Appropriate mechanisms are in place to ensure that damage to forest regeneration is compensated (chapter 6 §44-46).
5.4.13 Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.	YES	CR 12.4: "Structural elements necessary in terms of biological diversity (standing dead trees and down timber, retention trees, etc.) shall be retained during

Question	YES / NO*	Reference to scheme documentation
		regenerations cutting."
		CONFORMITY
Criterion 5: Maintenance and appropriate enhancement of p (notably soil and water)	rotective	functions in forest management
		IN 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."
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.		IN 1.2; "Forest management plan or information related to it shall include:" IN 1.2.3; "Nature conservation restriction and other restrictions to forest management."
	YES	IN 5.1; "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 strategic instruments set up to support these activities."
		IN 14.4: "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."
		The Assessor finds that taken in their entirety, these indicators demonstrate conformance to the PEFC Standard.

Question	YES / NO*	Reference to scheme documentation
		CONFORMITY
5.5.2 Areas that fulfil specific and recognised protective functions for society shall be registered and mapped, and forest management plans or their equivalents shall take these areas into account.	YES	IN 4.1: "IN 4.1: "FOREST MANAGERS know the location of objects of natural or cultural value in certified land. They are able to show them either on site or the objects have been entered in GIS."  IN 4.2: "Forest management shall not deteriorate the condition of known objects of nature and heritage conservation and other objects of cultural value."  IN 4.3: "If objects of potential protection value are discovered, the relevant state agency shall be notified"  IN 4.5: "LARGE-SCALE FOREST MANAGER shall continuously update information about the registered protected areas in their lands. The national database (EELIS) is updated once a week and LARGE-SCALE FOREST MANAGER should always keep their data updated."  IN 5.3: "FOREST MANAGER is able to show the protected pars of the forest either on site or the objects have been entered in GIS."  CONFORMITY
		Additionally provided evidence
5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.	YES	(Copy of EST PEFC Review of NCRs 5July12) states, "Protection of sensitive forest soils and erosion prone areas is regulated by the forest management rules ( <a href="https://www.riigiteataja.ee/akt/126022014016">https://www.riigiteataja.ee/akt/126022014016</a> ) which stipulates that excessive damage to forest soils is prohibited (§19 (1). For

Question	YES / NO*	Reference to scheme documentation
		instance, the surface of the felling site may not be disturbed on more than 25% of the felling area and if extraction roads are damaged by forest machinery then the roads must be fixed within a reasonable time (max 1 year)."  CR 5, IN 5.5: "FOREST MANAGER shall organize management of game population to minimise damages by game."  The Assessor believes there to be
		sufficient evidence to consider this to be in conformance with PEFC requirements.  CONFORMITY
5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.	YES	Additionally provided evidence (Copy of EST PEFC Review of NCRs 5July12) states, "Protection of sensitive forest soils and erosion prone areas is regulated by the forest management rules (https://www.riigiteataja.ee/akt/1 26022014016)which stipulates that excessive damage to forest soils is prohibited (§19 (1).  Additionally provided evidence (Copy of EST PEFC Review of NCRs 5July12) states that The Forest Act stipulates that the use of pesticides is permitted only in cases where it is warranted by the forest pathological expert to contain the mass spread of insects or pests in the forest. In normal forestry practices, the use of pesticides is forbidden, see (https://www.riigiteataja.ee/akt/1 26022014017)  CR 6, IN 6.4: "Where fertilisers are used, they shall be applied in a

Question	YES / NO*	Reference to scheme documentation
		controlled manner and with due consideration for the environment."
		The Assessor believes that the preponderance of evidence demonstrates this to be in conformance with PEFC requirements.
		CONFORMITY
5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.	YES	CR 14. "Use of roads for transporting timber and construction of new roads shall take economic, natural and social conditions into consideration."  Additionally provided evidence by PEFC EST(Copy of EST PEFC Review of NCRs 5 July 12) states, "Planning of new roads, bridges or drainage systems reconstruction or other infrastructure is regulated by legislation and is subject to planning (chapter 5 - https://www.riigiteataja.ee/akt/8 54517?leiaKehtiv.). It is legal requirement to plan the bridge, road or culvert so that it is safe to users and the environment (§31)."  The Assessor finds the preponderance of evidence indicates this to be in conformance with PEFC requirements.  CONFORMITY
Criterion 6: Maintenance of other socio-economic functions	and cond	itions
5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.	YES	IN 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

Question	YES / NO*	Reference to scheme documentation
		resources,"  In 15.1: "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 socioeconomic functions of forests."  CONFORMITY
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	YES	CR 15: "Forest management shall consider the interests of the local community."  CR 15, IN 15.6: "Forest management shall promote the long-term health and well-being of communities."  CONFORMITY
5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.	Yes	CR 19.1: "The ownership rights and the form of land possession of the respective forest area shall be clearly specified, documented and stipulated. Also the legal, customary and traditional rights related with the forest land shall be explained, recognized and observed."  CONFORMITY
5.6.4 Forest management activities shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved or is in dispute there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst	YES	CR 19.1: "The ownership rights and the form of land possession of the respective forest area shall be clearly specified, documented and stipulated. Also the legal, customary and traditional rights related with the forest land shall be explained, recognized and observed"  CONFORMITY

Question	YES / NO*	Reference to scheme documentation
respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.		
5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	IN 16.1: "FOREST MANAGER shall not without good reason impose restrictions to staying the forest from sunrise to sunset and to gathering mushrooms, berries or medicinal herbs."  CONFORMITY
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.		IN 4.1: "IN 4.1: "FOREST  MANAGERS know the location of objects of natural or cultural value in certified land. They are able to show them either on site or the objects have been entered in GIS."
	YES	IN 4.2: "Forest management shall not deteriorate the condition of known objects of nature and heritage conservation and other objects of cultural value."
		IN 4.3: "If objects of potential protection value are discovered, the relevant state agency shall be notified"
		IN 4.4: "Management of areas of protection value is performed pursuant to the established procedure."
		IN 4.5: "LARGE-SCALE FOREST MANAGER shall continuously update information about the registered protected areas in their lands. The national database (EELIS) is updated once a week and LARGE-SCALE FOREST MANAGER should always keep their data updated."
		IN 5.3: "FOREST MANAGER is able to show the protected parts of the

Question	YES / NO*	Reference to scheme documentation
		forest either on site or the objects have been entered in GIS."  CONFORMITY
5.6.7 Forest management operations shall take into account all socio-economic functions, especially the recreational function and aesthetic values of forests by maintaining for example varied forest structures, and by encouraging attractive trees, groves and other features such as colours, flowers and fruits. This shall be done, however, in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land.	YES	IN 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."  IN 16.4: "Without good reason, no restrictions shall be placed on forest recreation."  CONFORMITY
5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.	YES	IN 17.1: "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."  CONFORMITY
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.	YES	CR 15, 15.3 "Forest management practices shall make the best use of local forest-related experience and knowledge."  CONFORMITY
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.	YES	CR 2, IN 2.3: "Objectives of forest use, estimate of forestry works and the general plan are available for interested persons."  CR 15, IN 15.5: "Information on forestry works shall be accessible for interested persons."  IN 15.7: "Appropriate mechanisms shall be used for resolving

Question	YES / NO*	Reference to scheme documentation
		complaints and disputes that respectfully involve and consider the disputants in process."
5.6.11 Forestry work shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.	Yes	IN 18.1: "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."  CONFORMITY
5.6.12 Working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations.	YES	IN 18.3: "Working conditions shall be safe and everyone, who is assigned a task at forestry works, is supervised and trained about safe working techniques."
5.6.13 Forest management shall comply with fundamental ILO conventions.		Estonia has ratified the following core ILO Conventions: 29, 87,98,100,105,11,138,182 CONFORMITY
5.6.14 Forest management shall be based intervalia on the		CR 19: "Forest management shall comply with all laws and regulations and the requirements of this standard."
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.	NO	IN 19.1: "FOREST MANAGER shall comply with all applicable laws."  The assessor can find no reference or inference within the standard to indicate any relation to research and data collection needed for sustainable forest management or support relevant research activities carried out by

Question	YES / NO*	Reference to scheme documentation
		other organizations, as appropriate.  MINOR NONCONFORMITY
Criterion 7: Maintenance and appropriate enhancement of particles (notably soil and water)	protective	functions in forest management
		CR 19: "Forest management shall comply with all laws and regulations and the requirements of this standard."
		IN 19.1: "FOREST MANAGER shall comply with all applicable laws.
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.		IN 19.4: "The ownership rights and the form of land possession of the respective forest area shall be clearly specified, documented and stipulated. Also, the legal, customary and traditional rights related with the forest land shall be explained, recognised and observed."
	YES	IN 18.1: "Forestry work shall be planned, organized 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 in their work and about preventative measures."
		IN 18.3: "Working conditions shall be safe and everyone, who is assigned a task at forestry works, is supervised and trained about safe working techniques."
		Taken in their entirety, the Assessor determines this is in conformance to the PEFC Standard.

Question	YES / NO*	Reference to scheme documentation
		CONFORMITY
		CR 19: "Forest management shall comply with all laws and regulations and the requirements of this standard."
		IN 19.1: "FOREST MANAGER shall comply with all applicable laws.
	YES	In 3.1: "Forest manager shall implement a monitoring system to monitor, at least:"
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		IN 3.1.1: "The condition of forests and damage to forests;"
other illegal activities.		IN 3.2.2: "Littering of forests:"
		IN 3.3: "Forest damages shall be registered and relevant authorities shall be notified of them."
		Taken in their entirety, the Assessor finds this to be in conformance to the PEFC Standard.
		CONFORMITY

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



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

### 1 Scope

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

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

### 2 Checklist

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
		Certification B	odies	
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	YES	PEFC EST 3, Sec. 5.2.5: "The certification body must be impartial, independent third-party that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and is independent of the of the certified entity."  CONFORMITY
2.	Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 3.1	YES	PEFC 3, Sec. 5.2.1: "The certification body mustfulfil the general criteria, as appropriate, for certification bodies defined in ISO 17021."  CONFORMITY
3.	Does the scheme documentation require that	Annex 6, 3.1		PEFC EST 3, Sect. 4.1.1; "The auditors must:

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
	certification bodies carrying out forest certification shall have the technical			3. Have a good knowledge on the Estonian Forest Certification System with regard to forest management.
	competence in forest management on its economic, social and environmental		YES	4. Have a general knowledge on forest management and its environmental impacts.
	impacts, and on the forest certification criteria?			Professional expertise in forest management and its environmental impacts is proved on the basis of appropriate education and/or professional experience."
				Sect. 5.3; "The certification body must:
				3. Have a general knowledge on wood procurement and material flows in forest industries."
				CONFORMITY
	Does the scheme documentation require that			PEFC EST 3, Sect. 4.1.1; "The auditors must:
4.	certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management certification?	Annex 6, 3.1	YES	3. Have a good knowledge on the Estonian Forest Certification System with regard to forest management."  CONFORMITY

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
5.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	Annex 6, 3.2	YES	PEFC EST 3, Sect. 4.1.1; "The auditors must:  2. Have general criteria for certification bodies operating product certification.  3. Have a good knowledge on the Estonian Forest Certification System with regard to forest management.  4. Have a general knowledge on forest management and its environmental impacts.  Professional expertise in forest management and its environmental impacts is proved on the basis of appropriate education and/or professional experience."  CONFORMITY
6.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	YES	PEFC EST 3, Sect. 4.1.1; "The auditors must:  1.Fulfil general criteria for quality and environmental management systems as defined in ISO 19011."  CONFORMITY
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [*1]	Annex 6, 3.2	YES	PEFC EST 3, Sect. 4.1: "The qualification criteria for auditors used in certification audits are based on general auditing guidelines for quality and/or environmental management systems, or the general criteria for certification bodies operating product certification, and complemented with sectorial expertise."  PEFC EST 3, Sect. 4.1 para 2; "Professional expertise in forest management and its environmental impacts is proved on the basis of appropriate education and/or professional experience."

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
				PEFC EST 3, Sect. 4.2, ""The qualification criteria for auditors used in certification audits are based on general auditing guidelines for quality and/or environmental management systems, or the general criteria for certification bodies operating product certification, and complemented with sectorial expertise."  PEFC EST 3, Sect. 4.2, para 2,"Professional expertise in wood procurement and material flows in forest industries is proved on the basis of appropriate education and/or
				The Assessor believes that based on the entirety of the evidence presented this conforms to PEFC requirments.
		Certification pro	cedures	
8.	Does the scheme documentation require that certification bodies shall have		YES	PEFC EST 3, Sect. 4.1: "The auditors must:  1.Fulfil general criteria for quality and
	established internal procedures for forest management certification?	Annex 6, 4	TES	environmental systems as defined in ISO 19011."  The Assessor notes that ISO 19011 covers this requirement.  CONFORMITY
9.	established internal procedures for forest	Annex 6, 4	YES	environmental systems as defined in ISO 19011."  The Assessor notes that ISO 19011 covers this requirement.

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
	documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?		YES	must: 1. Fulfil general criteria for quality and environmental systems as defined in ISO 19011."
				CONFORMITY
11.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4	YES	PEFC EST 4, Sect. 6; "Certification body shall provide the Estonian Forest Certification Council with information about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates."  CONFORMITY
12.	Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4	YES	PEFC EST 4, Sect. 6; "Certification body shall provide the Estonian Forest Certification Council with information about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates."  CONFORMITY
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	NO	PEFC EST 4, Sect. 5.3.3; "Surveillance audits are carried out at least once a year during the validity of the certificate."  Calling for surveillance audits to be carried out "at least one a year does not preclude them from exceeding 365 days between audits.  MINOR NONCONFORMITY
14.	Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	YES	PEFC EST 4, Sect. 5.3.5; "The certificate is valid for a maximum of five years."  CONFORMITY

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	PEFC EST 4, Sect. 5.2.1, para. 9; "A summary of the certification report, including a summary of the findings on the auditee's conformity with the forest management standard, written by the certification body, shall be made available to the public by the Estonian Forest Certification Council".
16.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	Yes	PEFC EST 4, Sect. 5.2.1, para.8; "The audit evidence to determine the conformity with the forest management standard shall include relevant information from external parties (e.g. government agencies, community groups, conservation organizations, etc.) as appropriate."  CONFORMITY
17.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	N/A	
		Accreditation pro	ocedure	s
18.	Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	Annex 6, 5	YES	PEFC EST 3, Sect. 5.1; "Certification bodies carrying out forest management certification and/or chain of custody certification shall be accredited by a national or international accreditation body."
	decreated body.			CONFORMITY
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES	PEFC EST 3, Sect. 5.1, para. 2 "Accreditation symbol of the relevant accreditation body shall accompany any issued forest certificate and chain of custody certificate"  CONFORMITY
20.	Does the scheme documentation require that the accreditation shall be	Annex 6, 5		PEFC EST 3, Sect. 5.1 para.2; "The accreditation shall be issued by an accreditation body which is part of the

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
	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?		YES	European cooperation for Accreditation (EA) and/or the International Accreditation Forum (IAF) umbrella and which implement procedures described in ISO 17011 and other documents recognized by the above mentioned organizations."  CONFORMITY
21.	Does the scheme documentation require that certification body undertake forest management certification as "accredited certification" based on ISO 17021 or ISO Guide 65 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	YES	PEFC EST 3. Sec. 5.2.3: "The certification body mustundertake forest management certification as "accredited certification' based n ISO17021 or ISO Guide 65 and have the relevant forest management standard(s) covered by the accreditation scope."  CONFORMITY
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	YES	The Assessor notes that poritions of four certification scheme documents; i.e. PEFC EST 2, EST 3, EST 4 and "Notification of Certification Bodies for Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification scheme," taken in their entirety include a mechanism for PEFC notification of certification bodies.  CONFORMITY
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	YES	Althought the Assessor can find no explicit statement that <u>all</u> CB's complying with EMSN requirements may enter into PEFC Estonia notification, no evidence was noted in PEFC EST 2, EST 3, EST 4 and the document titled "Notification of Certification Bodies for Chain of Custody and Forest Management Certification in Estonia against the

No.	Question	Reference to PEFC Council PROCEDURES	YES / NO*	Reference to scheme documentation
				requirements of the Estonian Forest Certification scheme," that indicated discriminatory elements in the notification procedures for CBs.
				CONFORMTIY

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

<sup>[\*1]</sup> This is not an obligatory requirement



## Part V: Standard and System Requirement Checklist for system specific Chain of custody standards – COMPLIANCE WITH PEFC ST PEFC 2002:2013

#### 1 Scope

Part V is used for the assessment of scheme specific chain of custody standards against PEFC ST 2002:2013 (Chain of Custody of Forest Based Products - Requirements).

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

On November 20, 2012, the EMNS unanimously elected to adopt the PEFC Technical Document 2002:2010 Chain of Custody of Forest Based Products in its entirety and without modification. However, the criteria required for the PEFCC Chain of Custody requirements for forest-based products call for PEFC ST 2002:2013.

On July 7, 2015 PEFC Estonia updated their Chain of Custody Standard to adopt completely and without modification "Chain of Custody of Forest Base Products – Requirement (PEFC ST 2002:2013.)

The PEFC Estonia Chain-of-Custody is in conformance to PEFC standard requirements.



### Part VI: Standard and System Requirement Checklist for scheme administration requirements

### 1 Scope

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

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the standard or the guide.

The compliance with these requirements is only evaluated in the first PEFC assessment of a scheme or on specific request by the PEFC Secretariat.

### 2 Checklist

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents			
	PEFC Notification of certification bodies						
1.	Are procedures for the notification of certification bodies in place, which comply with chapter 5 of PEFC GD 1004:2009, Administration of PEFC scheme?	Chapter 5	YES	Certification scheme documents PEFC EST 2, EST 3, EST 4 and "Notification of Certification Bodies for Chain of Custody and Forest Management Certification in Estonia against the requirements of the Estonian Forest Certification scheme," taken in their entirety demonstrate conformance to the standard.  CONFORMITY			
	PEFC I	ogo usage licen	sing				
2.	Are procedures for the issuance of PEFC Logo usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, Administration of PEFC scheme?	Chapter 6	YES	On 20 November2012, PEFC Estonian adopted PEFC 2001:2008 Logo Usage Rules in its entirety and without modification.  CONFORMITY			
	Complaints	and dispute pro	ocedure	S			
3.	Are complaint and dispute			PEFC EST 2, Sect 9., 9.1., 9.2.			

No.	Question	Reference to PEFC GD 1004:2009	YES / NO*	Reference to application documents
	procedures go usage licenses in place, which comply with chapter 6 of PEFC GD 1004:2009, Administration of PEFC scheme?		YES	PEFC EST 4, Sect. 7, 7.1, 7.2, 7.3 <b>CONFORMITY</b>



# Annex 2: Working Group and Stakeholder Survey and Survey Responses

PEFC Estonia: Revised Standard Assessment
Standard Working Group: Stakeholder Survey
<ol> <li>When were you invited to participate in the revision process of the Forest Certification System of PEFC Estonia?</li> </ol>
Date (DD/MM/YYYY)/
2. In your view, were all interested parties given the possibility to participate and contribute to the scheme development and revision?
Yes No
If NO, please explain.
3. In your opinion, did the organizers provide you the relevant material necessary to participate in the scheme development and revision?
Yes No
If NO, please explain.

4. Was the development and revision process well planned and structured?
Yes No
If NO, please explain.
5. Do you believe you had access to working papers at all times during the process?
Yes No
If NO, please explain.
6. Do you believe your views were appropriately considered during the development and revisior process?
Yes No
If NO, please explain.
7. Do you believe a consensus was reached in the development of the certification criteria?
Yes No

If NO, please explain.
8. In your view, did the participating stakeholders represent the range of interests in forest management in your country? If not, in your opinion, which other interest groups should hav participated?
Yes No
Please list other interest groups?
9. Do you believe any aspects of the scheme deserve further consideration?
Yes No
If No, please explain.



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# PEFC Eesti: Uuendatud Standardi hindamine Standardi uuendamise töögrupp: Huvirühmade küsitlus

Mr. Kristjan Tonisson
1. Millal Teid kutsuti osalema PEFC Eesti metsasertifitseerimise skeemi revisjoni protsessis?
Kuupäev (päev/kuu/aasta) _25 / _03 / _2009
2. Kas Teie arvates anti kõikidele huvitatud isikutele võimalus protsessis osaleda ja nad said anda oma
panuse metsasertifitseerimise skeemi arendamisse ja täiendamisse?
lah V Ei
Jah _X Ei
Kui ei, selgitage.
3. Kas Teie arvates varustasid korraldajad Teid piisava ja asjakohase teabega, et saaksite
metsasertifitseerimise skeemi arendamises ja täiendamises osaleda?
Jah _X Ei
Kui ei, selgitage.
ikui ci, scigituge.
4. Kas metsasertifitseerimise skeemi uuendamise protsess oli hästi planeeritud ja struktureeritud?
Jah _X Ei

Kui ei, selgitage.
5. Kas Teil oli juurdepääs asjakohastele töödokumentidele kogu protsessi vältel?
Jah_X Ei
Kui ei, selgitage.
6. Kas Teie meelest võeti Teie arvamusi ja seisukohti metsasertifitseerimise skeemi uuendamise protsessis piisavalt arvesse?
Jah_X Ei
Kui ei, selgitage.
7. Kas Teie meelest jõuti metsasertifitseerimise skeemi uuendamise protsessis sertifitseerimiskriteeriumite osas konsensusele?
Jah_X Ei
Kui ei, selgitage.
8. Kas Teie arvates esindasid metsasertifitseerimise skeemi uuendamise protsessis osalenud huvirühmad suurt osa erinevatest metsade majandamisega seotud huvidest? Kui mitte, siis millised huvirühmad oleksid veel pidanud protsessis osalema?
JahX_
Kui ei, siis palun nimetage huvigruppe, kes pidanuks samuti protsessis osalema.
9. Kas Teie hinnangul vajab mõni PEFC Eesti metsasertifitseerimise skeemi osa veel täiendavat tööd ja edasiarendamist?
Jah Ei _X
Kui jah, selgitage.



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# PEFC Eesti: Uuendatud Standardi hindamine Standardi uuendamise töögrupp: Huvirühmade küsitlus

Mr. Ott Otsman
1. Millal Teid kutsuti osalema PEFC Eesti metsasertifitseerimise skeemi revisjoni protsessis?
Kuupäev (päev/kuu/aasta) / juuli / 2009
I am not 100% sure about date, because it was quite some years ago.
2. Kas Teie arvates anti kõikidele huvitatud isikutele võimalus protsessis osaleda ja nad said anda oma panuse metsasertifitseerimise skeemi arendamisse ja täiendamisse?
Jah
Kui ei, selgitage.
3. Kas Teie arvates varustasid korraldajad Teid piisava ja asjakohase teabega, et saaksite metsasertifitseerimise skeemi arendamises ja täiendamises osaleda?
Jah
Kui ei, selgitage.
4. Kas metsasertifitseerimise skeemi uuendamise protsess oli hästi planeeritud ja struktureeritud?

Jah
Kui ei, selgitage.
5. Kas Teil oli juurdepääs asjakohastele töödokumentidele kogu protsessi vältel?
Jah
Kui ei, selgitage.
6. Kas Teie meelest võeti Teie arvamusi ja seisukohti metsasertifitseerimise skeemi uuendamise
protsessis piisavalt arvesse?
Jah
Kui ei, selgitage.
7. Kas Teie meelest jõuti metsasertifitseerimise skeemi uuendamise protsessis
sertifitseerimiskriteeriumite osas konsensusele?
Jah
Kui ei, selgitage.
8. Kas Teie arvates esindasid metsasertifitseerimise skeemi uuendamise protsessis osalenud huvirühmad suurt osa erinevatest metsade majandamisega seotud huvidest? Kui mitte, siis millised
huvirühmad oleksid veel pidanud protsessis osalema?
Jah
Kui ei, siis palun nimetage huvigruppe, kes pidanuks samuti protsessis osalema.
9. Kas Teie hinnangul vajab mõni PEFC Eesti metsasertifitseerimise skeemi osa veel täiendavat tööd ja
edasiarendamist?
Jah



+202-340-1543 | simpson@gwgcltd.com

# PEFC Eesti: Uuendatud Standardi hindamine Standardi uuendamise töögrupp: Huvirühmade küsitlus

Mr. Allen Simms
1. Millal Teid kutsuti osalema PEFC Eesti metsasertifitseerimise skeemi revisjoni protsessis?
Kuupäev (päev/kuu/aasta) 02 / 12 / 2010
2. Kas Teie arvates anti kõikidele huvitatud isikutele võimalus protsessis osaleda ja nad said anda oma panuse metsasertifitseerimise skeemi arendamisse ja täiendamisse?
Jah _X Ei
Kui ei, selgitage.
3. Kas Teie arvates varustasid korraldajad Teid piisava ja asjakohase teabega, et saaksite metsasertifitseerimise skeemi arendamises ja täiendamises osaleda?
Jah _X Ei
Kui ei, selgitage.
4. Kas metsasertifitseerimise skeemi uuendamise protsess oli hästi planeeritud ja struktureeritud?

Jah _X Ei _	
Kui ei, selgitage.	
5. Kas Teil oli juurdepääs as	jakohastele töödokumentidele kogu protsessi vältel?
Jah_X Ei	
Kui ei, selgitage.	
6. Kas Teie meelest võeti Te protsessis piisavalt arvesse?	eie arvamusi ja seisukohti metsasertifitseerimise skeemi uuendamise ?
Jah_X Ei	
Kui ei, selgitage.	
7. Kas Teie meelest jõuti me sertifitseerimiskriteeriumite	etsasertifitseerimise skeemi uuendamise protsessis e osas konsensusele?
Jah_X Ei	
Kui ei, selgitage.	
	d metsasertifitseerimise skeemi uuendamise protsessis osalenud evatest metsade majandamisega seotud huvidest? Kui mitte, siis millised danud protsessis osalema?
Jah _X Ei	
Kui ei, siis palun nimetage h	nuvigruppe, kes pidanuks samuti protsessis osalema.
9. Kas Teie hinnangul vaja edasiarendamist?	b mõni PEFC Eesti metsasertifitseerimise skeemi osa veel täiendavat tööd ja
Jah Ei	
Kui ei, selgitage.	

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## PEFC Eesti: Uuendatud Standardi hindamine

### Standardi uuendamise töögrupp: Huvirühmade küsitlus

1. Millal Teid kutsuti osalema PEFC Eesti metsasertifitseerimise skeemi revisjoni protsessis?
Kuupäev (päev/kuu/aasta) / juuli / 2009
I am not 100% sure about date, because it was quite some years ago.
2. Kas Teie arvates anti kõikidele huvitatud isikutele võimalus protsessis osaleda ja nad said anda oma panuse metsasertifitseerimise skeemi arendamisse ja täiendamisse?
Jah
Kui ei, selgitage.
3. Kas Teie arvates varustasid korraldajad Teid piisava ja asjakohase teabega, et saaksite metsasertifitseerimise skeemi arendamises ja täiendamises osaleda?
Jah
Kui ei, selgitage.
4. Kas metsasertifitseerimise skeemi uuendamise protsess oli hästi planeeritud ja struktureeritud?
Jah
Kui ei, selgitage.
5. Kas Teil oli juurdepääs asjakohastele töödokumentidele kogu protsessi vältel?
Jah
Kui ei, selgitage.
6. Kas Teie meelest võeti Teie arvamusi ja seisukohti metsasertifitseerimise skeemi uuendamise protsessis piisavalt arvesse?
Jah
Kui ei, selgitage.

sertifitseerimiskriteeriumite osas konsensusele?
Jah
Kui ei, selgitage.
8. Kas Teie arvates esindasid metsasertifitseerimise skeemi uuendamise protsessis osalenud huvirühmad suurt osa erinevatest metsade majandamisega seotud huvidest? Kui mitte, siis millised huvirühmad oleksid veel pidanud protsessis osalema?
Jah
Kui ei, siis palun nimetage huvigruppe, kes pidanuks samuti protsessis osalema.
9. Kas Teie hinnangul vajab mõni PEFC Eesti metsasertifitseerimise skeemi osa veel täiendavat tööd ja edasiarendamist?
Jah
Kui ei, selgitage.

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# PEFC Eesti: Uuendatud Standardi hindamine

# Standardi uuendamise töögrupp: Huvirühmade küsitlus

1. Millal Teid kutsuti osalema PEFC Eesti metsasertifitseerimise skeemi revisjoni protsessis?					
Kuupäev (päev/kuu/aasta) 25 / 03 / 2009					
2. Kas Teie arvates anti kõikidele huvitatud isikutele võimalus protsessis osaleda ja nad said anda oma panuse metsasertifitseerimise skeemi arendamisse ja täiendamisse?					
Jah Ei					
Jah anti					
Kui ei, selgitage.					
3. Kas Teie arvates varustasid korraldajad Teid piisava ja asjakohase teabega, et saaksite metsasertifitseerimise skeemi arendamises ja täiendamises osaleda?					
Jah Ei					
Jah					
Kui ei, selgitage.					
4. Kas metsasertifitseerimise skeemi uuendamise protsess oli hästi planeeritud ja struktureeritud?					
Jah Ei					
Jah oli.					
Kui ei, selgitage.					
5. Kas Teil oli juurdepääs asjakohastele töödokumentidele kogu protsessi vältel?					
Jah Ei					
Jah. Tööprotsessi käigus oli mul ligipääs kõikidele asiakohastele dokumentidele.					

as Teie meelest protsessis piisav	võeti Teie arvamusi ja seisukohti metsasertifitseerimise skeemi uuendamise valt arvesse?
Jah	Ei
Jah võeti.	
Kui ei, selgitage	•
	jõuti metsasertifitseerimise skeemi uuendamise protsessis kriteeriumite osas konsensusele?
Jah	Ei
Jah jõuti.	
Kui ei, selgitage	•
huvirühmad suu	esindasid metsasertifitseerimise skeemi uuendamise protsessis osalenud urt osa erinevatest metsade majandamisega seotud huvidest? Kui mitte, siis nmad oleksid veel pidanud protsessis osalema?
Jah	Ei
Jah kõik huvirüh	nmad olid kaasatud.
Kui ei, siis palun	nimetage huvigruppe, kes pidanuks samuti protsessis osalema.
Kas Teie hinnang ja edasiarendan	gul vajab mõni PEFC Eesti metsasertifitseerimise skeemi osa veel täiendavat tööd nist?
Jah	Ei
Kui ei, selgitage	•
Kindlasti tuleks seadusandlus.	mõne aasta pärast skeem uuesti üle vaadata kuna muutunud on Eesti

Kui ei, selgitage.



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# PEFC Eesti: Uuendatud Standardi hindamine

# Standardi uuendamise töögrupp: Huvirühmade küsitlus

1. Millal Teid kutsuti osalema PEFC Eesti metsasertifitseerimise skeemi revisjoni protsessis?
Kuupäev (päev/kuu/aasta) / /
Täpset kuupäeva ei mäleta
2. Kas Teie arvates anti kõikidele huvitatud isikutele võimalus protsessis osaleda ja nad said anda oma panuse metsasertifitseerimise skeemi arendamisse ja täiendamisse?
Jah _X Ei
Kui ei, selgitage.
3. Kas Teie arvates varustasid korraldajad Teid piisava ja asjakohase teabega, et saaksite metsasertifitseerimise skeemi arendamises ja täiendamises osaleda?
Jah _X Ei
Kui ei, selgitage.
4. Kas metsasertifitseerimise skeemi uuendamise protsess oli hästi planeeritud ja struktureeritud?
JahX_
Kui ei, selgitage.

5. Kas Teil oli juurdepääs asjakohastele töödokumentidele kogu protsessi vältel?	
Jah_X Ei	
Kui ei, selgitage.	
6. Kas Teie meelest võeti Teie arvamusi ja seisukohti metsasertifitseerimise skeemi uuendamise protsessis piisavalt arvesse?	
Jah_X Ei	
Kui ei, selgitage.	
7. Kas Teie meelest jõuti metsasertifitseerimise skeemi uuendamise protsessis sertifitseerimiskriteeriumite osas konsensusele?	
Jah_X Ei	
Kui ei, selgitage.	
8. Kas Teie arvates esindasid metsasertifitseerimise skeemi uuendamise protsessis osalenud huvirühmad suurt osa erinevatest metsade majandamisega seotud huvidest? Kui mitte, siis millised huvirühmad oleksid veel pidanud protsessis osalema?	
JahX_	
Kui ei, siis palun nimetage huvigruppe, kes pidanuks samuti protsessis osalema.	
9. Kas Teie hinnangul vajab mõni PEFC Eesti metsasertifitseerimise skeemi osa veel täiendavat to ja edasiarendamist?	ööd
Jah EiX_	
Kui ei, selgitage.	
PEFC Eesti metsasertifitseerimise skeemi osa peaks olema kooskõlas rahvusvahelise PEFC sertifitseerimissüsteemi nõuetega, Eesti seadusandlusega ning Eesti metsamajandamise hea	ide

praktikatega. Seetõttu minu arvates hetkel olulisi täiendusi ei ole vaja teha.



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# PEFC Eesti: Uuendatud Standardi hindamine

# Standardi uuendamise töögrupp: Huvirühmade küsitlus

1. Millal Teid kutsuti osalema PEFC Eesti metsasertifitseerimise skeemi revisjoni protsessis?
Kuupäev (päev/kuu/aasta) / / 2009
2. Kas Teie arvates anti kõikidele huvitatud isikutele võimalus protsessis osaleda ja nad said anda oma panuse metsasertifitseerimise skeemi arendamisse ja täiendamisse?
Jah x Ei
Kui ei, selgitage.
3. Kas Teie arvates varustasid korraldajad Teid piisava ja asjakohase teabega, et saaksite metsasertifitseerimise skeemi arendamises ja täiendamises osaleda?
Jah x Ei
Kui ei, selgitage.
4. Kas metsasertifitseerimise skeemi uuendamise protsess oli hästi planeeritud ja struktureeritud?
Jah x Ei
Kui ei, selgitage.

5. Kas Teil oli juurdepääs asjakohastele töödokumentidele kogu protsessi vältel?	
Jah_x Ei	
Kui ei, selgitage.	
6. Kas Teie meelest võeti Teie arvamusi ja seisukohti metsasertifitseerimise skeemi uuendamise protsessis piisavalt arvesse?	
Jahx Ei	
Kui ei, selgitage.	
7. Kas Teie meelest jõuti metsasertifitseerimise skeemi uuendamise protsessis	
sertifitseerimiskriteeriumite osas konsensusele?	
lah r:	
Jah_x Ei	
Kui ai galaita sa	
Kui ei, selgitage.	
Q. Voc Tojo anistas ocindacid matsasartifitsaarimisa skaami uuandamisa nrotsassis asalanud	
8. Kas Teie arvates esindasid metsasertifitseerimise skeemi uuendamise protsessis osalenud huvirühmad suurt osa erinevatest metsade majandamisega seotud huvidest? Kui mitte, siis millised huvirühmad oleksid veel pidanud protsessis osalema?	
Jah Ei _x	
Kui ei, siis palun nimetage huvigruppe, kes pidanuks samuti protsessis osalema.	
FSC sertifitseerimise initsiaatorid ( WWF ), kes ignoreerisid PEFC protsessi	
9. Kas Teie hinnangul vajab mõni PEFC Eesti metsasertifitseerimise skeemi osa veel täiendavat tö ja edasiarendamist?	ÖC
Jah Ei x	
Kui ei, selgitage.	



### **Annex 3: Comments from International Consultation**

# International consultation - Estonian Forest Certification Scheme View Response

Answers to International consultation - Estonian Forest Certification Scheme COMPLETE RESPONSE

Response ID #335331. Submitted on 11 Jul 2014 12:05 by SEBASTIEN GENEST Response visibility: **Anyone who can view responses**.

#### **Public Profile**

Name SEBASTIEN GENEST

Email eglantinegoux@yahoo.fr

Date 11 Jul 2014 12:05

**Private Profile** 

First Name SEBASTIEN

Last Name GENEST

**Country** France

Organisation

Stakeholder Category NGO/civil society

#### **Focus**

Please add your comments on the Estonian Forest Certification Scheme.

You must provide an answer to this question.

I have identified some gaps in the Estonian national scheme, unless the Estonian scheme secretariat explains that the missing point I mention appear somewhere in the PEFC national schemes of Estonia.

So, please find below the details of my comments.

#### In the Forest Management standard of Estonian scheme (PEFC EST SFM standard):

Introduce requirements about the forest management plan:

- 1. 1. The forest management shall be clear, objective-based, have measurable impact, auditable and provide evidence of compliance with the requirement of the forest management standard (according to PEFC ST 1003:2010; criterion 4.1.);
- 2. The forest management plan shall be periodically updated (according to PEFC ST 1003:2010; criterion 5.1.4.);
- 3. The forest management plan shall indicate and justify annual cutting, respecting national law about allowable cutting per species (according to PEFC ST 1003:2010; criterion 5.1.5.);

Introduce a requirement demanding the mapping and the protection (at least 5% of the productive forest) of rare, protected AND endangered habitats existing within the forest

management unit (according to PEFC ST 1003:2010; criterion 5.4.2.);

Introduce a requirement about the reduction of pesticides and the preference given to biological control of pests (according to PEFC ST 1003:2010; criterion 5.2.8.);

Introduce a requirement about the necessity to achieve studies about direct and indirect negative impact of the forest management and integrate measures in the forest management plan dealing with the mitigation of these impacts (according to PEFC ST 1003:2010; criterion 5.1.2.);

Introduce a requirement about the banning of forest conversion (according to PEFC ST 1003:2010; criterion 5.1.11.);

Introduce a requirement about the consultation of local communities (according to PEFC ST 1003:2010; criterion 5.6.10.);

Could you explain why there are no requirements about the respect of ILO 169 and the United Nation Declaration of Indigenous peoples?

#### In the Estonian standard setting:

Introduce requirements about the necessity to adopt a proactive policy which ensure key stakeholders participation (according to PEFC ST 1001:2010; criteria 5.2.);

Introduce a requirement about the identification of a balanced representation of



### **Annex 4: Translated Supplemental Evidentiary Documentation**

From: Mart Kelk [mailto:mart.kelk@mail.ee]

Sent: Wednesday, January 04, 2012 3:27 AM To: loodusaeg@lists.ut.ee

Subject: PEFC metsamajandamise standardi muutmisprotsess

Attachment: PEFC standardi eelnou

Estonian Forest Certification Council has begun working with stakeholders to Estonian PEFC forest management standard modification .

We ask all interested parties to send their proposals to the standard eeln6usse e - mail address: m art.kelk@mail.ee

Yours faithfully,

Mart Kelk

tel . +372 5349 0286 The EFCC

**Estonian Forest Certification Council** 

Estonian PEFC forest certification scheme for the renewal of a working group meeting

protocol

05.02.2012

The Chair: Mart Kelk

Minutes: Mart Kelk

Beginning of the meeting: 10:15

Participants at the meeting:

- 1) sled Mart Estonian Society of Foresters
- 2) Kristel Arukask- Estonian Private Forest
- 3) Henn Korjus Estonian University of Life Sciences
- 4) Ott Otsmann Estonian Forest and Wood Industries Association
- 5) Kristjan Tõnisson The State Forest Management Centre
- 6) Veiko Belials Kulosaari
- 7) Allan Sims Estonian University of Life Sciences

Agenda:

- 1. Summary of previous work
- 2. The standard inspection
- 3. The standard process of disclosure of information days
- 4. Disclosure Standards Vote
- 1. All members of the Working Group has transmitted the context of standard parts of your chapters, and Estonia

Forest Certification Standard Allan Sims assembled

2. Members of the team are familiar with the work completed, and no longer wish to suggest improvements

add

3. Arrange the month of April in three different regions of the Estonian Estonian Forest Standard presenting briefings. Regions: Tallinn, Pärnu, Tartu. Aim to cover as much of the

Estonia and to give interested persons an opportunity to come to the place of the standard creators and rapporteurs

discuss and make proposals for amendments. Information Days of information transmitted via the Estonian PEFC

4. Disclosure of standard forestry list to stakeholders - whether to send the standard 60 day disclosure process?

Vote: public show of hands vote, all of the.

Decision: Disclose the standard 60 days to challenge the parties and interest groups to make proposals to change the standard.

From: Mart Kelk [mailto:mart.kelk@mail.ee]

Sent: Wednesday, April 04, 2012 1:34 AM To: pefc.list@lists.erametsaliit.ee

Subject: PEFC uue standardi infopaevad

Estonian Forest Certification Council calls on the information days

Estonian Forest Certification Council conducts three infopaeva PEFC forest certification standards, and introduce innovations in supply chain standards.

Infopaevad place

Tallinn, April 10 13: 00-16: 00 in Tallinn Service School, at the Lighthouse 2 new 6ppehoones Classroom B-311

April 12 pärnus 13: 00-16: 00 Pärnu County Vocational Education Center, located at Niidupargi tn 8 // 12, further training room turns

Tartu, April 17 13: 00-16: 00 Dorpat Conference Center, Salt Street 6. Pirogov conference room

Specifically, the presentations

- 1. Estonian Forest Oievaade new standard -Allan Sims Ireland Maaiilikool
- 2. Forest management certification auditor pilgulab i -Kaido Hops Metrosert
- 3. Chain of Custody Certification certification experience Renal Lastik BM Trada Ireland 00
- 4. The Green Card system will -Margus Paesalu

Please let us know at his coming mart .keik @ metsaselts.ee or by calling 53490286 Infopaevade rienteeruvalt duration is 3 hours, which includes a coffee break iiks.

Specifically, information on infopaevade Mart sled mart.kelk@ma il.ee tel. +372 5349 0286

Welcome.

06:12 starting at 11.00 koigile buvilistele Four Deer Recreation Centre Seminar on PEFC forest certification.

Forest certificate is the timber for the buyer proof that the forest management in a balanced manner taking into account the economic, social and environmental aspects. Wood mtiiija for certification gives assurance that the market-leading lilepakkurnise event takes felled timber buyer.

In Estonia there are more than 90 000 ha of forest land owners of their forests riihmasertifikaadiga covered. Given the increasing expectations of meat lihiskonna certified timber can be expected that in the future will become even more important in the possession of the certificate.

Paevakava

11:00 to 11:30 Gathering and welcome coffee

1, 1:30 to 12:45 PEFC conditions, a lecturer Allan Sims Maatilikooli Ireland Senior Fellow

12:45 to 13:15 practical experience in the example of Forestry and Forest Eesti AS, Member of the Board Enn Sapp

13:15 to 13:30 Kiisimused and discussion

For more information and registration by phone 53468109 or e-mail address kristel.arukask@erametsaliit. ee.

Sincerely Kristel Arukask EEML

**Estonian Forest Certification Council** 

Estonian PEFC forest certification scheme for the renewal of a working group meeting

protocol

14.05.2012

The Chair: Mart Kelk

Minutes: Mart Kelk

Beginning of the meeting: 13:00

Participants at the meeting:

- 1) sled Mart Estonian Society of Foresters
- 2) Kristel Arukask- Estonian Private Forest
- 3) Henn Korjus Estonian University of Life Sciences
- 4) Ott Otsmann Estonian Forest and Wood Industries Association
- 5) Kristjan Tõnisson The State Forest Management Centre
- 6) Veiko Belials Kulosaari
- 7) Allan Sims Estonian University of Life Sciences

Agenda:

- 1. publicity period of 60 days from the feedback gathered
- 2. The standard notification briefings
- 3. Approval of the Working Group on Standardization
- 1. Estonian Forest standard disclosure period gave feedback

proposals, proposals for discussion:

Metrosert suggestions: Upgrade the standard sections used in the ISO and EN (Estonia)

Standard names and lausestus (see the minutes of the meeting ANNEX 1)

Estonian University of Life Sciences proposals: to improve the wording (see the minutes of the meeting ANNEX 2)

Kaido Humali suggestions: make the standard more specific (see the minutes of the meeting

Kaido Humali suggestions: make the standard more specific (see the minutes of the meeting ANNEX 3)

2. Approval of the Working Group on Standardization - is to acknowledge the work of the Working Group terminated and confirm

that the standard is ready and send it EMSN'i juharusele confirm?

Vote: public show of hands vote, all of the.

Decision: The document has been prepared and transmitted to the Board for approval EMSN'i

### Working Group Minutes – Untranslated Originals

#### EMSN Üldkoosoleku protokoll

Tallinn, Erametsakeskus 01. juuni 2010 a

Algus kell 10:00, lõpp kell 12:00

Juhatas: Kalle Põld (EEML esindaja)

Protokollis: Vaike Pommer (Eesti Metsaseltsi esindaja)

Osalesid: Heiki Hepner, Mart Kelk, Vaike Pommer, Kalle Põld, Kalev Tihkan, Kristjan Tõnisson, Veiko Belials, Henn Korjus

#### Päevakava:

- 1. Ülevaade PEFC sertifitseerimise hetkeseisust
- 2. EMSN majandusaasta aruande kinnitamine
- 3. Uue juhatuse liikme kinnitamine
- 4. Uued logo maksud ja sertifitseerimise tasud
- 5. EMSN-i liikmeskond
- 6. PEFC Eesti Metsastandardi revisjoni töörühm

#### 1. Ülevaade sertimise hetkeseisust Eestis

Erametsade sertifitseerimise rühmasertifikaadiga on ühinenud 44 metsaomanikku ja PEFC nõuete alusel sertifitseeritakse esimeses ringis 51468.68 ha. Rühmasertifikaat on avatud ja sellega on võimalik pidevalt liituda.

PEFC logo kaustamisi taotlusi on15, kellest seitsmega on sõlmitud logo kasutamise lepingud. (Madis Kinks, Ants Erik, Külli Erik, Metsatervenduse OÜ, Metsamaahalduse AS, OÜ Eremka, MTÜ Erametsalii).

Tarneahela serifitseerimisega tegelevad:

ALKO-Agrar-und Lebensmittel-Kontrollorganisation, BM Trada Certification Limeted (alates märtsist 2010), BMG TRADA Certifiering AB, HolzCert Austria, SGS South Africa (PTY) Ltd - Qualifor Programme,.

Tarneahela sertifikaati omavad juba ja kõigil neil on pikendamisel ka logo kasutamise leping: Kroonpress (pikendati aprillis), MAP Eesti AS, Nason Davis Eesti OÜ, Printall AS (alates veebruarist 2010), Väärispuu ja Spooni AS, Wertholz Eesti OÜ.

#### 2. Majandusaasta aruanne

Kalle Põld andis ülevaate ja selgitusi EMSN 2009 aasta aruande kohta. Aruanne on eelnevalt juhatuses läbi vaadatud.

Ühehäälselt otsustati: Kinnitada EMSN 2009 a aruanne muudatusteta.

#### **Uue liikme kinnitamine EMSN juhatusse**

EMTL on valinud ja volitanud oma esindajaks EMSN juhatuses Ott Otsmanni. Vahetus on seotud Andres Talijärve lahkumisega juhatusest seoses siirdumisega KKM-i.

**Ühehäälselt toetati:** Andres Talijärve vabastamist juhatuse liikmest ja EMSN juhatuse uue liikmena Ott Otsmanni nimetamist, kes esindab EMTL-i.

#### 3. Logo kasutamise maksud ja *notification fee* suuruse muutmine

Mart Kelk tutvustas üldkoosolekule juhatuses läbivaadatud ja heakskiidetud maksude ja tasude muudatusi.

Ettepanek notification fee muutmiseks:

Jrk nr	Metsamaa	Pindalaline jaotus	Notification fee suurus €/ha	
		ha		
			praegu	ettepanek
1.	Majandatav mets	kuni 100	0	0
		100 – 4 999	0,015	0,15
		5 000 – 9 999	0,03	0,10
		10 000 – 49 999	-	0,05
		50 000 - 100 000	-	0,03
		üle 100 000	-	3 200
2,	Kaitsepiirangutega mets	≤ 5000	0	0
		>5000	0,01	0,01

Logo kasutamise maksud on differentseeritud vastavalt PEFC nõukogu poolt kasutatavatele kategooriatele:

Kate-	Kasutaja rühm	Logo	Logo kasutamise perioodi tasu EEK/EUR			
gooria		väljaandmise tasu				
		EEK				
			praegu	ettepanek diferentseerim-ks		
			rakendatav	ha	€	
2	Metsaomanik/	0	0	kuni 100	20	
	metsahaldur			1005000	40	
				üle 5000	60	
3 kategooria differantseerimisel aluseks käive				käive milj EUR	€	
3	Metsatööstus	0		kuni 12,5	100	
				12,525,5	150	
			1 560	üle 25	200	
4	Muud kasutajad	0	10 000		320	

Otsustati: Kinnitada esitatud logo kasutamise maksud ja sertifitseerimise (notification fee) tasude muudatused ja rakendada neid alates 01. juulist. Enne 01.06.2010 laekunud taotluste puhul rakendada

perioodi tasu 2010 a osas 50% ulatuses.

4. EMSN-i liikmeskond

MK: Liikmeks olekust loobus Puutöö Liit. Tänaseks on tema õigusjärglane Möölitootjate Liit.

Potsentsiaalne liige võiks olla ka Puitmajade Liit. Nimemuutuse on läbi teinud Eesti

Metsaülemate Ühing, kellest on saanud Eesti Metsateenijate Ühing. Liikmete hulgast tuleb välja arvata

Metsakaitse- ja Metsauuenduskeskus. Tänane liikmeskond on alljärgnev:

Eesti Erametsaliit, Eesti Metsatööstuse Liit, Riigimetsa Majandamise Keskus, Eesti Maaülikool, Luua Metsanduskool, Eesti Metsatöötajate Ametiühing, Eesti Metsateenijate Ühing, Eesti Metsaselts, Eesti

Metsaüliõpilaste Selts, Eesti Evangeelse Luterliku Kiriku Konsistoorium, Eesti Apostlik Õigeusu Kirik, Eesti

Looduskaitse Selts.

Üksmeelselt toetati: Juhatuse ettepanekul võtab Mart Kelk EMSN liikmeskonna laiendamiseks ühendust

Mööblitootjate Liidu ja Puitmajade Liidu esindajatega.

6. PEFC Eesti Metsastandardi revisjoni töörühm

Töörühma töö rahastamiseks ja tulemuste rakendamiseks on esitati rahastustaotlus KIKile. Taotlus on heakskiidetud. PEFC Eesti Metsastandardi skeemi revisjoni töörühma ülesandeks on kogu skeemi aktualiseerimine, mida tuleb teha iga 5 aasta järel. Tänu Kristjan Tõnissoni tööle on metsamajandamisega seotud reeglid valdavalt uuendatud. Teha on veel tarneahela pool ning töötada välja Rohelise kaardi Eesti versioon ning selle rakendamise põhimõtted. Kogu protsess peab olema avalik, et kõik huvigrupid saaksid

kaasa rääkida.

Otsustati: Määrata töörühma kokkukutsujaks ja juhendajaks Mart Kelk.

Protokollis:

Juhatas:

Vaike Pommer Kalle Põld

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Eesti Metsasertifitseerimise Nõukogu

Eesti PEFC metsasertifitseerimise skeemi uuendamise töögrupi I koosoleku protokoll

09.11.2010

Koosoleku juhataja: Mart Kelk Koosoleku protokollija: Klaus Vinkman Koosoleku algus: 11.15

Koosolekul osalejad:

1) Mart Kelk

2) Klaus Vinkman

3) Henn Korjus

4) Kalev Tihkan

5) Kristjan Tõnisson

6) Veiko Belials

7) Allan Sims

1) Üldine ülevaade sertimise hetkeseisust:

**Mart**: Kokku 9 tarneahela sertifikaadiga firmat. Peaks lisanduma 2 firmat paberivaldkonnast veel. Viimati liitus Victor Stationary OÜ, 5 kasutavad PEFC logo. PEFC logo kasutab erametsaomanikest 12 metsaomanikku.

KIK toetab EMSN-i poolt tehtud taotlust Eesti PEFC metsasertfitseerimise skeemi uuendamiseks. See summa pole küll see, mis oodati aga hädavajalikuga saab hakkama. Kindlasti on vaja on liita meie skeemiga Rohelise Kaardi süsteem, mis on Rootsi algmega (rootsi keeles).

2) Töögrupi töö

**Mart**: 12.nov General Assambley. Kinnitatakse ilmselt uus tarneahela standard ja hulk muid meile tähtsaid dokumente. 21.okt koostati tarneahela standardi viimane versioon. Avalikul arutelul alates 08.nov. See saab aluseks Eesti standardile. See on ka kõige tähtsam dokument, mille kallal töötada tuleb.

**Kristjan:** Kuidas see asi meie skeemiuuendusega kokku läheb? Üks rida on alusdokumendid, teine ajakava. Teha tabel, et millal, mida teha ja kuidas teha vaja on! Maatriks nt kus komponendid sees.

Mart: Tabelit (veel) ei ole

Kristjan: Kas on dokument mida skeem sisaldama peab? Mida meilt oodatakse?

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**Mart:** Muudatused tarneahela logo kasutamises, kus ja kuidas kasutada. Võrrelduna Eestis kasutusel olevaga on tarneahela osas täielik mittevastavus. Lisaks on veel hulk väiksemaid dokumente mis sätestavad uue korra ka metsamajandamise sertifitseerimiseks. **Henn:** Tarneahel on rahvusvaheline, selle ülesehitust ei peaks muutma, ainult tõlkima ja panema kasutusse.

**Kristjan:** Kohalikele oludele kohandada, et nt digit.veoseleht.

**Mart:** Kogu dokumendisüsteem on ümber tehtud, nt annex'ite asemel on konkreetsed uued juhendid (nt PEFC ST 2001:xxxx). Praegu logo kasutus eraldi teema, kui tarneahel uueneb, siis on seal omakorda logo kasutamine sees.

**Kristjan:** Sõltub paljuski, mis rahvusvaheline pool ette kirjutab. Metsastandardi osa tuleks kokkuleppida nõukogu siseselt ühiselt. Sissejuhatus Eesti skeemi vajab kaasajastamist. Metsamajandamise ja puidu tarneahela kord tuleb üle vaadata eraldi asjatundjatega. **Puidu tarneahela standard:** 12.nov otsusest lähtudes hakata läbi töötama uusi nõudeid ja enne tõlgime Eesti keelde. Tarneahelasse peaks metsatööstus panustama. Tõlketöö sisse osta. Seejärel avalikule arutelule. Auditi ja sertifitseerijate kvalifikatsiooni kord, kas see on palju muutunud?

Mart: Olemas on 2008 vorm. Eestis 2006. Muudatusi põhjalikke pole.

**Kristjan:** Vaiete pool, kui pole vaja muuta, siis võiks paika jääda. Logo kasutamine sõltub tarneahelast. Võiks viia tarneahela nõuetega ühte gruppi.

Mart: vaiete pool kinnitatakse 2 aasta tagant.

**Kristjan:** Tuleks jagada alapunktideks tegevused ja skeemi struktuur.

**Mart:** Mart tegeleb sissejuhatuse, apellatsioonide ja auditi nõuetega. Võrrelda akrediteerimiskeskuse infoga/nõuetega.

#### Tarneahela mustandiga tutvumine version 4.3

Mart saadab töögrupi liikmetele tööks vajalikud failid

**Kristjan:** Näha on, et meie praegune standard on ajast ja arust võrreldes uuega. Kindel on see, et on vaja uuele versioonile tõlge. Kindlasti oleks vaja teha ka koolituspäevi uue tarneahela skeemi kohta, esinema sertifitseerijad nt. Et katta korralduskulusid, siis peaks võtma ka osalustasu.

**Kristjan:** Võiks Läti skeemist malli võtta. Nad on värskelt oma skeemi uuendanud ja taotlevad uuesti PEFC-d. Tarneahela uuendamise osas peaks Otiga rääkima, et ehk on ta nõus vedama tarneahela töögruppi.

Kristjan: Et üldse kogu dokumendist ülevaadet saada on vaja ikkagi sisukorda.

**Henn:** Sissejuhatus üle vaadata. Selgitus võiks olla juures, et millest täpselt jutt. Tegijad jmt lisasse. Dokumenti loevad ka need kes ei tea asjast üldse midagi ja see peaks neile ka arusaadav olema.

**Kristjan:** Teeme edasise töökorralduse. Lisaks sisejuhatusse nimed, kes võrdleb ja kes mida teeb. Mart vaatab sissejuhatust, Rahvuslik metsastandard ja metsamajandamise kord üheks punktiks panna töögrupi töös – teeb Kristjan. Tarneahela kord ja nõuded, ning logo kasutamine oleks ühes blokis – Ott.

apellatsioonid ja vaided kokku samuti audiitorite sertijate sertifitseerimise kord. Apellatsioonide ja vaiete lahendamise kord. – Mart. Vaja jaotada, mis dokumendid mille kohta käivad.

Henn: ISO:19011 alus tarneahelale ja metsamajandamisele.

Mart: Tarneahel tuleb kohe töösse võtta, sellega on kõige kiirem.

Krisjtan: Ott võiks sellega tegeleda. Osta sisse tarneahela audiitor, kes tehnilist spetsifikatsiooni tunneb.

**Mart:** Saadab kommenteeritud dokumendid metsamajandamise standardi kohta Kristjanile. Ning ülejäänud dokumendid ka, sõltuvalt kes, millega tegeleb.

**Kristjan:** Selle kuu lõpuks võiks kõik dokumendid üle vaadata, mis puudutavad metsamajandamise osa ja siis ka ühiselt rääkida metsamajandamise standardist ning see valmis kirjutada. Tarneahela arutamiseks peaks kokku leppima jooksvalt koosoleku, ning panema paika selle tegevuskava ning draft jaanuari lõppuks valmis.

Mart: Järgmine koosoleku toimumise aeg: 2. dets. kell 11.00, Tartus Metsamajas, ruumiinfo tuleb hiljem järgneb.

Koosoleku lõpp: 12.42

#### Eesti Metsasertifitseerimise Nõukogu

Eesti PEFC metsasertifitseerimise skeemi uuendamise töögrupi I koosoleku protokoll

#### 02.detsember 2010

Koosoleku juhataja: Kristjan Tõnisson Koosoleku protokollija: Klaus Vinkman Koosoleku algus: 11.15

Koosolekul osalejad:

- 1. Mart Kelk
- 2. Kristjan Tõnisson
- 3. Ott Otsmann
- 4. Ants Varblane
- 5. Allan Sims
- 6. Veiko Belials
- 7. Klaus Vinkman
- 8. Tarmo Vahter

#### 1) Metsasertifitseerimise standardi parandus ja muudatusettepanekute ülevaatus

Ott: kas praegune standard läheb vastuollu või uuendame niisama?!

Kristjan: Alus on moraalselt vananenud. PEFC on guideline uuendanud ja aasta on üleminekuperiood.

Ott: Kas PEFC'l on omaette standard ka kuskil?

Kristjan: Ei ole, ainult juhendid on. Tarneahela kohta on oma standard.

Järgneb arutelu standardi muudatuste üle. Muudatusettepanekud on tehtud aasta tagasi huvigruppide esindajate poolt ja Kristjan on teinud ühe tervikliku faili, kus kõik ettepanekud sees. Arutelu tulemusena valmib standardist uus versioon, mille Kristjan asjaosalistele laiali saadab. Seejärel toimub ka uus töögrupi koosolek, et vaadata esimene versioon üle ja teha vajadusel uued ettepanekud-muudatused.

#### Lisateema:

[Tarneahela töögrupp –viimati vastuvõetud standard tõlkida, kaasata audiitor vmt töögruppi (kes tõlke kontrolliks, nt 1NEPCon ja Metrosert). Osa skeemist ja tarneahela võiks teha Ott, et tööstuse pool kaasata (nt BM Trada). Rahvusvaheline standard üle võtta. Peamiselt võiks töögrupis osaleda firmad, kes juba osalevad PEFC kasutamises või kes

on kursis sellega. Täiendada e-veoselehe osa tarneahela standardis. Vaja, et rahvusvahelised nõuded oleks täidetud ning huvigruppidel oleks ka võrdsed võimalused osaleda.]

Lõpp 14.10

#### Eesti Metsasertifitseerimise Nõukogu

Eesti PEFC metsasertifitseerimise skeemi uuendamise töögrupi koosoleku protokoll

#### 05.02.2012

Koosoleku juhataja: Mart Kelk Koosoleku protokollija: Mart Kelk Koosoleku algus: 10.15 Koosolekul osalejad:

- 1) Mart Kelk Eesti Metsaselts
- 2) Kristel Arukask– Eesti Erametsaliit
- 3) Henn Korjus Eesti Maaülikool
- 4) Ott Otsmann Eesti Metsa- ja Puidutööstuse Liit
- 5) Kristjan Tõnisson Riigimetsa Majandamise Keskus
- 6) Veiko Belials Luua Metsanduskool
- 7) Allan Sims Eesti Maaülikool Päevakord:
  - 1. Senise töö kokkuvõte
  - 2. Standardi ülevaatus
  - 3. Standardi avalikustamise protsessi infopäevad
  - 4. Standardi avalikustamine hääletu
  - 1. Kõik töögrupiliikmed on oma osad edastanud seoses standardi peatükkidega ning Eesti Metsasertifitseerimise standard Allan Simsi poolt kokku pandud
  - 2. Töögrupi liikmed on valminud tööga tutvunud ning ei soovi enam parandusettepanekuid lisada

Korraldada aprilli kuus üle Eesti kolmes erinevad piirkonnas Eesti metsastandardit tutvustavad infopäevad. Piirkonnad: Tallinn, Pärnu, Tartu. Eesmärk katta võimalikult suur osa Eestist ja anda võimalus huvilistel tulla kohale, et standardi loojate ja ettekandjatega diskuteerida ning teha ettepanekud muudatustes. Infopäeva info edastada läbi Eesti PEFC metsanduslisti osapoolteni

1. Standardi avalikustamine - kas saata standard 60 päevasele avalikustamise protsessile?

Hääletus: avalik hääletus käetõstmisega, kõik poolt.

Otsus: Avalikustada standard 60 päevaks üleskutsega osapooltel ja huvigruppidel teha ettepanekuid standardi muutmiseks.

Koosoleku lõpp kell 10:55

#### Eesti Metsasertifitseerimise Nõukogu

Eesti PEFC metsasertifitseerimise skeemi uuendamise töögrupi koosoleku protokoll

#### 14.05.2012

Koosoleku juhataja: Mart Kelk Koosoleku protokollija: Mart Kelk Koosoleku algus: 13:00

Koosolekul osalejad:

- 1) Mart Kelk Eesti Metsaselts
- 2) Kristel Arukask– Eesti Erametsaliit
- 3) Henn Korjus Eesti Maaülikool
- 4) Ott Otsmann Eesti Metsa- ja Puidutööstuse Liit
- 5) Kristjan Tõnisson Riigimetsa Majandamise Keskus
- 6) Veiko Belials Luua Metsanduskool
- 7) Allan Sims Eesti Maaülikool Päevakord:
  - 1. Avalikustamise perioodi 60 päeva jooksul kogutud tagasiside
  - 2. Standardi teavituse infopäevad
  - 3. Standardi kinnitamine töögrupi poolt
  - 1. Eesti Metsasertifitseerimise standardi avalikustamise perioodi jooksul saadi tagasiside ettepanekutega, ettepanekute arutelu:

AS Metrosert ettepanekud: Kaasajastada standardi peatükkides kasutatavad ISO ja EN (Eesti) standardi nimetused ja lausestus (vt koosoleku protokolli LISA 1)

Eesti Maaülikooli ettepanekud: parandada sõnastust (vt koosoleku protokoll LISA 2)

Kaido Humali ettepanekud: muuta standard konkreetsemaks (vt koosoleku protokoll LISA 3)

2. Standardi kinnitamine töögrupi poolt - kas tunnistada töögrupi töö lõppenuks ning kinnitada, et standard on valmis ja saata see EMSN'i juharusele kinnitamiseks?

Hääletus: avalik hääletus käetõstmisega, kõik poolt.

Otsus: Standard on valmis ning edastada EMSN'i juhatusele kinnitamiseks

Koosoleku lõpp kell 15:15

#### EMSN juhatuse koosoleku protokoll

Tallinn 20. September 2012. a

Algus kell 11:00

Juhatas: Mart Kelk Protokollis: Kristel Arukask

Osalesid: Mart Kelk, Ott Otsmann, Vaike Pommer, Kristel Arukask, Kalev Tihkan, Allan Sims

#### Päevakord:

1. Eesti PEFC standardi kinnitamine

2. Muud küsimused

#### 1. Eesti PEFC standardi kinnitamine

Eesti PEFC standardi töögrupp jõudis oma 14.05.2012 toimunud koosolekul otsusele EMSN-i juhatusele esitada järgnev ettepanek: kinnitada Eesti PEFC standard ning esitada see Rahvusvahelisele PEFC'le ülevaatamiseks

Hääletus: Kõik poolt

#### Otsus:

Kinnitada Eesti PEFC standard ning esitada see Rahvusvahelisele PEFC organisatsioonile üle vaatamiseks

#### 2. Muud küsimused

Puuduvad

Koosoleku lõpp 11:25

Koosoleku juhataja: Mart Kelk Protokollija: Kristel Arukask

**From:** Mart Kelk [mailto:mart.kelk@mail.ee] **Sent:** Monday, February 20, 2012 09:11 AM **To:** loodusaeg@lists.ut.ee

**Subject:** PEFC metsamajandamise standard Attachment: Eesti PEFC standard sisu\_AS\_3

#### Tere.

Saadame Teile tutvumiseks PEFC Eesti metsamajandamise standardi.

Ettepanekuid ja parandusi standardisse ootame e-posti aadressil: mart.kelk@mail.ee

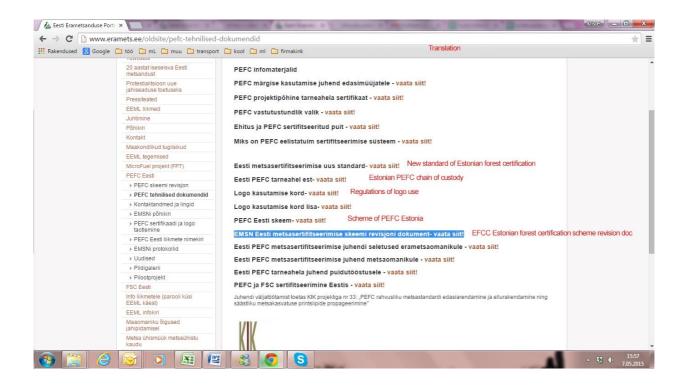
Lugupidamisega Mart Kelk

tel. +372 5349 0286 EMSN

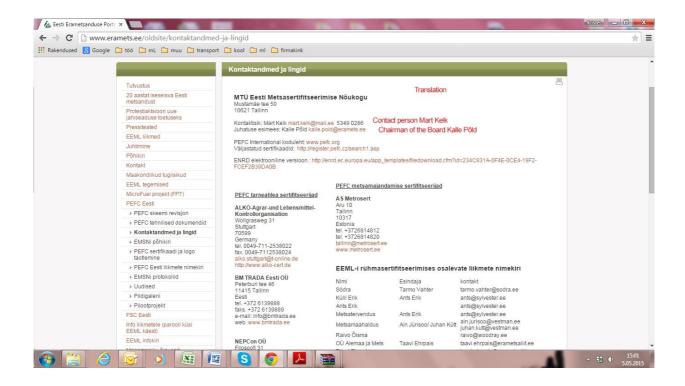


Estonian Forest Certification Standard Working Group				
Working Group Member Organization		E-mail Contact Information		
Ott Ottsman	Estonian Forest and Wood Industries Association	ott.otsmann@empl.ee		
Kristjan Tõnisson	State Forest Management Centre	kristjan.tonisson@rmk.ee		
Allan Sims	Estonian University of Life Sciences	Allan.Sims@emu.ee		
Veiko Belials	Luua Forestry School	veiko@luua.ee		
Kristel Arukask	Estonian Private Forest Union	kristel.arukask@erametsaliit.ee		
Kalev Tihkan	Estonian Society for Nature Conservation	kalev.tihkan@keskkonnaamet.ee		
Mart Kelk	Private Forest Centre	mart.kelk@metsaselts.ee		
Meelis Rauert	Unknown	meelis.rauert@mail.ee		
Klaus Vinkman	Unknown	klaus@apmets.ee		
Ando Eelmaa	Unknown	ando.eelmaa@neti.ee		
Jaanis Aun	Unknown	jaanus.aun@eramets.ee		
Henn Korjus	Unknown	henn.korjus@emu.ee		
Mikk Link	Unknown	mikklink@gmail.com		
Ants Varblane	Unknown	ants.varblane@metsaselts.ee		
Tarmo Vahter	Sodra Corporation	tarmo.vahter@sodra.ee		
Kalle Põld	Unknown	kalle.pold@eramets.ee		

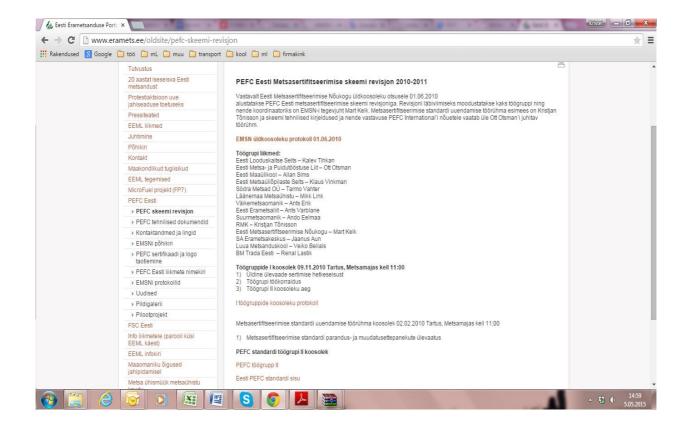
# EMSN Website Screenshot Announcing Public Invitation form EMSN Announcing Standard Revision Process



### EMSN Website Screenshot: Working Group Names and Contact Information



### EMSN Website Screenshot Publishing Minutes of 01.06.2010 Meeting





# **Annex 5: Panel of Experts Comments**

Assessment of the Estonian PEFC scheme - Panel of Experts review: Mark Edwards

Report chapter / page	PoE member	Consultant's report statement	PoE member comment	Consultant's response			
General co	General comments						
N/A	ME	that the cor	eration of the whole report, I concurnsultant has mounted a satisfactory	■ Noted			
		endorsed u framework	<ul> <li>case to demonstrate that the EFCS should be reendorsed under the PEFC's mutual recognition framework</li> <li>The non-conformities, in my opinion, do not call into the overall integrity of the EFCS as it is assessed against the PEFC international sustainability benchmarks as the non-conformities can be rectified under reendorsement conditions</li> <li>I have a certain sympathy with the Consultant as this is not a polished report but it may be</li> </ul>				
		call into the is assessed sustainabilities.					
		endorseme I have a cer as this is no					
		the Consul	such due to the acknowledged difficulties that the Consultant experienced with the English translation of the EFCS documentation and the				
			provision of supplementary evidence which may not have been translate				
		Consultant report relat					
		<ul><li>I believe th</li></ul>					
		for conside Convention after month standardise	, 0 1	<ul> <li>Overarchin g criterion are noted with each PEFC</li> </ul>			
		comment, please insert a comma at end of date		requiremen			

- for consistency e.g. On 20.03.2009, ...
- While the text of many of the forest management criteria and indicators relate to Estonian conditions, there appears to be the use of PEFC requirements from its forest management meta-standard rather than an interpretation for the Estonian national condition. There is no commentary on this issue.
- In Annex 1, Part III while the Indicators are explicitly noted there is no overarching criterion for most of the indicators. This should be obligatory as it defines the hierarchy of criterion/indicator which is being relied on as evidence for requirement conformance

respective indicators following. The Assessor believes that repetitive use of the overarchin g criterion within each requiremen t is merely redundant and does not add to report clarity.

t with

Addressed

Even though indicated in the explanation of Annex 1, there are many instances where text (in full or substantially in full) taken from PEFC EST SFM hasn't been italicised nor has the quotation marks used to end the relevant text. They are at:

Part 1: 4.1f); 4.3 Procedures; 4.4 Process; 4.6 Procedures; 5.5 a) Procedures; 5.6 c) Process; 5.8 Process; 5.10 Procedures/Process; 5.11 Process; 5.12 Process

Part 2: 4.1 c), e), f); 4.1.2

Part 2: 4.1 c), e), 1); 4.1.2
Part 3: 5.1.3; 5.1.4; 4.1.9; 5.1.10; 5.1.11; 5.2.1;

5.2.2; 5.2.3; 5.2.5; 5.3.2; 5.4.7; 5.4.12; 5.4.13; 5.5.1; 5.5.3; 5.5.4; 5.6.2; 5.6.3; 5.6.8; 5.6.10

Part 4: 2; 21

- Have provided short identifiers for all documents of EFCS in 1.5, so they all should be used, where appropriate, in the tables in Annex
- Any reference to a piece of national legislation should be in capitals letters and italicised eg the Forest Act YYYY. It is also a usual convention to add the year of enactment

- Unclear to the Assessor
- Noted: Dates unavailable

Legislation italicized.

Specific co	omments	1			
Table of Contents Pg 3	ME		Formatting issues at Annex 2, Annex 3, Annex 4 and Annex 5	•	Addressed
Acrony ms and Abbrevia tions Pg 5	ME	CARs PEFC ST	Have the same organisation under EFCC and EMSN!	•	Noted:Thes e are two separate bodies.
1.1, 2 <sup>nd</sup> para. Pg 7	ME	' conformity of the revised standard to PEFCC requirements.'	I don't believe it is just the 'standard', isn't it the 'scheme'?	•	Addressed
1.1, 2 <sup>nd</sup> para 3 <sup>rd</sup> dot point	ME	'Assessment of the forest certification standard(s)'	It should be clarified as the 'forest management certification standard'	•	Addressed
1.1, 2 <sup>nd</sup> para 11 <sup>th</sup> dot point	ME	'Results of PEFC International Consultation'	Needs further clarification with respect to this scheme	•	Noted: Standard PEFC procedure for all scheme assessment s
1.2 Phase 1 Step 3	ME	' and submit it to WG members.'	In the Acronyms and Abbreviations, Working Group is abbreviated as WGP not WG – need to use the preferred abbreviation throughout the report – would favour WG	•	Addressed
1.2 Phase 1 Step 5	ME	' the initial package of SFCS documentation.'	This is an instance of this report being a template from another scheme evaluation – please ensure all such references are to the Estonian scheme!	•	Addressed
<b>1.3.2</b> , 2 <sup>nd</sup> para Pg 9	ME	'Three surveys were received.'	What was the response rate i.e. out of how many sent out?	•	Addressed: Eventually seven surveys were received out of 10 sent.
1.4 Table 1 Pg 10	ME		Would this be better under 1.2 as it links to the steps in 1.2? Some formatting issues in some of	•	Noted Noted
- 5 - 0		I	2011 Torritating 155000 III 501110 01		11000

			4h a marria   ah1- 41 1	
			the rows – check the paragraph	_
			spacing!	<ul><li>Addressed</li></ul>
			In the first row, isn't it the	
a et		DEECSY : :	'Scheme' and not the 'Standard'?	
<b>1.5</b> , 1 <sup>st</sup>	ME	• PEFC National	In 3.3, use an identifier which isn't	■ Noted:
para		Forest Standard	used here?	Many of the
Pg 10		for Estonia		same
		• PEFC EST	Is this EST 1?	documents
Pg 11		Notification	Does this replace the first version	presented by
		Procedures	i.e. dot point1?	PEFC Estonia
		<ul> <li>PEFC National</li> </ul>	Is this PEFC EST Annex 11?	were identified
		Forest Standard		with different
		for Estonia		monikers by
3 <sup>rd</sup> para		• EST Annex 11	It isn't the title used in the list of	PEFC EST.
Pg 11		Standard Setting	Normative Documents on Pg 10	The Assessor
		Procedures of		tried using the
		Estonian Forest		same names
		Certification		but may have
		Scheme		missed some.
		• Copy of Public		11115500 5011101
		Invitation to		
		Comment on the		
		PEFC EST		
		Forest		
		Management		
		Standard		
1.6	ME	' dozens of	I would venture that they are	■ Noted: To be
	IVIL	standard	'schemes' not standards in the	
Pg 12				clear, the US
		assessments	context of the consultancy.	understanding
		submitted to the		of the term
		PEFC Board		"scheme"
		from standard		infers
		assessors.'		something
	3.55	( 1	7 111 1 10	underhanded.
2	ME	' has	I would have a clarification in the	<ul> <li>Addressed</li> </ul>
Pg 13		identified <u>6</u>	recommendation that if doesn't	
		Minor	impact on the integrity of the EFCS	
		Nonconformities	and that the N/Cs are able to be	
0 1 1 st	3.5	within'	rectified in given time constraints	** . *
<b>3.1</b> , 1 <sup>st</sup>	ME	'PEFC Estonia	An interesting choice of wording!	<ul><li>Noted</li></ul>
para		acquired PEFC	Maybe it could be changes to	
Pg 14		membership'	'became a member of PEFC'	
nd			References to a previous	<ul><li>Addressed</li></ul>
2 <sup>nd</sup> para		PEFC Slovenia;	assessment of another PEFC	
$1^{\text{st}}, 5^{\text{th}}$		SFCS & SFCS	member scheme	
and 6 <sup>th</sup>				Addressed:
dot		•		
dot			I don't understand what is meant by	American
points 2 <sup>nd</sup> dot		' through the	I don't understand what is meant by program of PEFC?	American terminology

point		PEFC'	and Abbreviations and in 1.1 – need	
3 <sup>rd</sup> para		'The Estonian Forest Certification System (EFCS)'  ' the overarching principals of' ' to "promote the application	to use a consistent term! I venture that they would be 'principles' Need to close the quotation marks!	<ul> <li>Addressed</li> </ul>
<b>3.2</b> , 1 <sup>st</sup> para	ME	' the revision was guided by	Maybe in this context is would be 'informed'?	• Noted
Pg 15 3 <sup>rd</sup> para		· and PEFC	Is it their requirements or their sustainability benchmarks? Needs	<ul><li>Addressed</li><li>Addressed</li></ul>
4 <sup>th</sup> para		International' ' to join the	qualification. This indicates one WG but the next paragraph has two WGs – so is it	<ul> <li>Addressed</li> </ul>
4 <sup>th</sup> & 5 <sup>th</sup> para 5 <sup>th</sup> para 6 <sup>th</sup> para Pg 16 7 <sup>th</sup> para		working group through' ' On 20 February 2012, the standard was made' ' the loodusaeg national listserv'  3 <sup>rd</sup> sentence  1 <sup>st</sup> and 2 <sup>nd</sup>	'working groups'? Presume it's the forest management standard – please clarify? Can this be further explained maybe in a footnote? This would be more readable if they were in dot points There is no indication of the delay from May to September? What standard is being discussed or is it the procedures? Don't require capitals – to be consistent with other sections As this is the Summary, at least the	<ul> <li>Noted: Not translatable into English.</li> <li>Noted</li> <li>Noted</li> <li>Noted</li> <li>Addressed</li> </ul>
		sentences – dates  ' covered in the standard. The standard addresses WG ' STANDARD SETTING PROCESSES	N/C should be referenced to the body of the report e.g. 'see Section 5 for description' (would apply to any other N/Cs)	
3.3	ME	Forest	Isn't it only a singular standard?	<ul> <li>Addressed</li> </ul>

3 <sup>rd</sup> para Pg 17 2 <sup>nd</sup> and 4 <sup>th</sup> para 5 <sup>th</sup> para		Certification Standards  '• The following documents form the basis of the PEFC Estonia Scheme. Rio Convention on Biological'  ' the Forest Certification	I think the first part of this is actual text and not part of the dot point which commences at 'Rio' Can this be reformatted? Close the quotation marks! Again, only a single standard?	<ul><li>Addressed</li><li>Addressed</li><li>Addressed</li><li>Addressed</li></ul>
		Standards		
<b>3.4</b> , 1 <sup>st</sup> para Pg 17	ME	'It also does well at setting out group member responsibilities.'	Would suggest that 'does well at setting out' could be replaced by 'satisfactorily describes'	<ul> <li>Addressed</li> </ul>
3.5, 1 <sup>st</sup> and 2 <sup>nd</sup> paras	ME	'the EMNS'	Isn't it 'the EMSN'?	<ul> <li>Addressed</li> </ul>
Pg 18 1 <sup>st</sup> para		' unanimously elected to adopt the PEFC	Would consider that 'agreed' or 'determined' may be better than 'elected'?	<ul><li>Addressed</li><li>Addressed</li></ul>
2 <sup>nd</sup> para		Technical Document'  1 <sup>st</sup> sentence	Also, aren't they designated as 'ST" for the PEFC standards? This repeats the 1 <sup>st</sup> sentence of the 1 <sup>st</sup> paragraph – can be deleted and the two paragraphs combined	<ul><li>Addressed</li></ul>
<b>3.6</b> , 1 <sup>st</sup>	ME	'the EMNS'	Isn't it 'the EMSN'?	<ul> <li>Addressed</li> </ul>
para Pg 18 1 <sup>st</sup> para		' the responsibility for the logo use and informing'	Is it 'authorising the use of based on achieving certification?	<ul> <li>Addressed</li> </ul>
<b>3.7</b> , 1 <sup>st</sup> para Pg 18	ME	' and a panel commissioner.	It is referred to as 'Chairman' in the last sentence of this paragraph – so which is the correct term?	<ul> <li>Addressed</li> </ul>
<b>3.8</b> , 2 <sup>nd</sup> para	ME	'Documentation and requirements are'	But what are they for?  Not in use now – isn't it ISO	<ul><li>Noted</li><li>Noted: Not</li></ul>
3 <sup>rd</sup> para		or ISO 17021 or ISO Guide 65.' i finds the standard to be'	17065? Is this the EFCS as refer to PEFC EST 3 and PEFC EST 4 as Guidelines which aren't standards!	at this writing.  • Addressed
<b>3.9</b> , 1 <sup>st</sup> para	ME	' significant amount of	What is it that requires 'interpretation' – needs	<ul><li>Addressed</li></ul>
para		interpretation	clarification?	<ul> <li>Addressed</li> </ul>

Again, is it the scheme? There is more than a standard to the EFCS!  " on the intent of the standard presented." " errors throughout the document, sometimes calling" " with regard to the standard setting processes was not included in the original submission and not"  3.10, 1st ME "All members of the Working Group were contacted"  2nd para Of Working Group responded. (See Annex 2)."  4, 1st ME "The Estonian Forest Certification para Pg 21  4, 1st ME para Pg 21  4, 1st ME overarching principals of implementing"  4, 1st De Pg 21  5 The Estonian para Pg 21  4, 1st De Pg 21  5 The Estonian para Pg 21  6 The Working Group responded (See Annex 2)."  6 The Working Group responded (See Annex 2)."  6 The Estonian para Pg 21  7 The Estonian para Pg 21  6 The Estonian para Pg 21  7 The Estonian para Pg 21  6 The Estonian para Pg 21  7 The Estonian para Pg 21  7 The Estonian para Pg 21  8 The Estonian para Pg 21  8 The Estonian para Pg 21  8 The Estonian para Pg 22  9 The Estonian para Pg 24  9 The Estonian para Pg 25  9 The Estonian para Pg 26  9 The Estonian para Pg 27  9 The Estonian para Pg 28  9 The Estonian para Pg 29  10 The Estonian para Pg 20  11 The Pg 20  12 The Pg 20  13 The Pg 20  13 The Pg 20  14 The Pg 20  15 The Estonian para Pg 20  15 The Estonian para Pg 20  16 The Working Principals of implementing principals of implement	2nd para  310, 1st para  310, 1st para  2nd para  4. 1st para 2nd para  2nd para  2nd para  2nd para 2nd para  4. 1st para 2nd par	<del> </del>	T	
3.10, 1st para Pg 20  "All members of the Working Group were contacted" Which WG or from both WGs?  "Three members of Working Group are presumably the greater the response rate, the higher level of assurance? Any reason why there was a low responded. (See Annex 2)."  Annex 2)."  Annex 2)."  "Addressed Presumably the greater the response rate, the higher level of assurance? Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  "Noted: Eventually ended with a significant response rate facilitated by PEFC Estonia  "Addressed Presumably the greater the response rate, the higher level of assurance? Any reason why there was a low response rate? Did PEFC Estonia  "In 1.1, 1.2, 1.4 and 4 all refer to Scheme" – need to use consistent terminology  "Scheme" – need to use consistent terminology  "Noted PEFC Estonia Interesting choice of wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  "PEFC Estonia Need to close the quotation "Addressed Addressed	3.10, 1st para   ME para   'All members of the Working Group were contacted'   Which was one WG, need to clarify which one as there are two WGs or does it apply to both WGs?   Address para   Address para   Which was one was there are two was or does it apply to both was?   Address para   Address para   Presumably the greater the response rate, the higher level of assurance? Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?   Address para para   Forest   Certification System (EFCS) has the overarching principals of implementing   Drincipals of implementing   Certification   Principals of implementing   Certification   Certification   Principals of implementing   Certification   Principals of implementing   Certification   Principals of implementing   Certification   Certification   Principals of implementing   Certification   Certificati	can be standard of the standard presented."  ' errors throughout document, sometimes calling"  ' with rest to the standard setting product was not incident in the original submission."	more than a standard Is it one document of documents of the EF Is this an issue which overlooked prior to see for the evaluation of the ev	at to the EFCS!  FCS?  The the PEFC TU  Seeking EOIs  Addressed  Noted
the Working Group were contacted'  2nd para  4, 1st para  4, 1st para  4, 1st para  4 para  5 crest para	the Working Group were contacted 'Which WG or from both WGs?  'Three members of Working Group responded. (See Annex 2). 'Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  The Estonian facilita		ers of If it was one WG, no	eed to clarify • Addressed
Group were contacted 'Which WG or from both WGs?  'Three members of Working Group responded. (See Annex 2).'  4, 1st Pg 21  Any reason why there was a low response rate? Did PEFC Estonia facilitated the survey?  The Estonian PG 21  Any reason why there was a low response rate? Did PEFC Estonia facilitated the survey?  Any reason why there was a low response rate? Did PEFC Estonia a significant response rate facilitated by PEFC Estonia  The Estonian In 1.1, 1.2, 1.4 and 4 all refer to 'Scheme' – need to use consistent terminology System (EFCS) has the overarching principals of implementing 'Interesting choice of wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  3rd para, 'PEFC Estonia' November 2002.  Addressed  Addressed  Addressed  Addressed  Addressed  Addressed  Addressed  Addressed	Group were contacted' Which WG or from both WGs?  2nd para  Three members of Working Group Any reason why there was a low responded. (See Annex 2).'  4, 1st para  Forest Certification System (EFCS) has the overarching principals of implementing'  2nd para  2nd para  Group were contacted' Which WG or from both WGs?  Fresumably the greater the response rate, the higher level of assurance? Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  In 1.1, 1.2, 1.4 and 4 all refer to 'Scheme' – need to use consistent terminology  I believe it is 'principles for' rather than 'principals of' implementing Interesting choice of wording – I principals of implementing as a member of the PEFC in November 2002.  3rd para, 1st, 5th & 6th dot point  PEFC Estonia acquired PEFC  6th dot point  Group rate develor assurance?  Fresumably the greater the response rate, the higher level of assurance?  Interesting choice of use consistent terminology  Interesting choice of wording – I principals of implementing as a member of the PEFC in November 2002.  PEFC Estonia acquired PEFC Need to refer to the scheme being evaluated and not to a previous scheme as this report has been used as a template		,	J
2nd para  of Working Group responded. (See Annex 2).'  Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  4, 1st Para Pg 21  ME The Estonian Forest Certification System (EFCS) has the overarching principals of implementing  2nd para  2nd para  Presumably the greater the response rate, the higher level of assurance? Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  In 1.1, 1.2, 1.4 and 4 all refer to 'Scheme' – need to use consistent terminology I believe it is 'principles for' rather than 'principals of' Interesting choice of wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  3rd para,  'PEFC Estonia Need to close the quotation	2nd para  'Three members of Working Group Any reason why there was a low responded. (See Annex 2).'  4, 1st para Pg 21  2nd para  WE The Estonian Forest Certification System (EFCS) has the overarching principals of implementing'  2nd para  2nd para  2nd para  YEFC Estonia acquired PEFC  4, 1st para, 1st, 5th & 6th dot point  2nd para  2nd para  2nd para  YEFC Estonia acquired PEFC  2nd para  YEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  Need to close the quotation  Need to response rate, the higher level of assurance?  Any reason why there was a low response rate, the higher level of assurance?  Any reason why there was a low response rate? Did PEFC Estonia as ignific response rate?			
of Working Group responded. (See Annex 2).'  Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  Any reason why there was a low response rate? Did PEFC Estonia facilitated by PEFC Estonia  4, 1st ME 'The Estonian Forest Certification System (EFCS) has the overarching principals of implementing coverarching principals of implementing coverarching principals of implementing coverated as a member of the PEFC in November 2002.  3rd para,  'PEFC Estonia Need to close the quotation  Tate, the higher level of assurance? Any reason why there was a low response rate? Did PEFC Estonia a significant response rate facilitated by PEFC Estonia  Forest Scheme' – need to use consistent terminology Interesting choice of wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  Addressed Addressed Addressed	of Working Group responded. (See Annex 2).'  4, 1st para Pg 21  Certification System (EFCS) has the overarching principals of implementing'  3rd para, 1st, 5th & 6h dot point  of Working Group responded. (See Annex 2).'  and para Any reason why there was a low response rate? Did PEFC Estonia facilitate the survey?  and para Forest Certification System (EFCS) has the overarching principals of implementing'  3rd para, 1st, 5th & 6h dot point  of Working Group rate, the higher level of assurance? Any reason why there was a low response rate? Did PEFC Estonia a signific respon rate facilitate the survey?  • Addres  Scheme' – need to use consistent terminology I believe it is 'principles for' rather than 'principals of' Interesting choice of wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002. Need to close the quotation Need to refer to the scheme being evaluated and not to a previous scheme as this report has been used as a template	contacted.	' Which WG or from	both WGs? • Addressed
Pg 21  Forest Certification System (EFCS) has the overarching principals of implementing'  Yellow Scheme' – need to use consistent terminology I believe it is 'principles for' rather than 'principals of' would expect that it was 'PEFC implementing as a member of the PEFC in November 2002.  Yellow Scheme' – need to use consistent terminology I believe it is 'principles for' rather than 'principals of' would expect that it was 'PEFC in November 2002.  Addressed  Addressed Addressed	Forest Pg 21 Certification System (EFCS) I believe it is 'principles for' rather than 'principals of' Interesting choice of wording — I would expect that it was 'PEFC implementing ' as a member of the PEFC in November 2002.  3rd para, 1st, 5th & acquired PEFC 6th dot point  Forest Certification System (EFCS) I believe it is 'principles for' rather than 'principals of' Interesting choice of wording — I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  PEFC Estonia Address	of Working Group responded. Annex 2).'	rate, the higher level Any reason why the response rate? Did F facilitate the survey?	I of assurance?  re was a low PEFC Estonia ?  significant response rate facilitated by PEFC Estonia
Certification System (EFCS) has the overarching principals of implementing'  Certification System (EFCS) I believe it is 'principles for' rather than 'principals of' would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  Potentification System (EFCS) I believe it is 'principles for' rather than 'principals of' would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  PEFC Estonia Need to close the quotation	Certification System (EFCS) has the overarching principals of implementing'  The para overarching principals of implementing  System (EFCS) has the overarching principals of implementing'  The para overarching principals of implementing'  Stop ara, 1st, 5th & 6th dot point  The para overarching principals of implementing'  The para overarching principals of interesting choice of wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I would expect that it was 'PEFC Estonia has a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I would expect that it was 'PEFC Estonia has a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I would expect that it was 'PEFC Estonia has a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I would expect that it was 'PEFC Estonia has a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I would expect that it was 'PEFC Estonia has a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I would expect that it was 'PEFC Estonia has a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I had been as a member of the PEFC in November 2002.  The para overarching principals of interesting choice of wording – I had been been interesting choice of wording – I had been been interesting choice of wording – I had been been interesting choice of wording – I had been been interesting choice of wording – I had been been been been been been been bee			
System (EFCS) I believe it is 'principles for' rather than 'principals of' overarching principals of implementing implementing as a member of the PEFC in November 2002.  System (EFCS) I believe it is 'principles for' rather than 'principals of' interesting choice of wording – I would expect that it was 'PEFC implementing as a member of the PEFC in November 2002.  *Addressed**  Addressed**  Addressed**	System (EFCS)   I believe it is 'principles for' rather than 'principals of'   Addressed    2 <sup>nd</sup> para   overarching   Interesting choice of wording – I would expect that it was 'PEFC   Estonia was admitted or endorsed as a member of the PEFC in November 2002.   Addressed    3 <sup>rd</sup> para, 1			
has the overarching principals of interesting choice of wording – I would expect that it was 'PEFC implementing'  as a member of the PEFC in November 2002.  3rd para,  has the other than 'principals of' wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  • Addressed • Ad	has the overarching principals of implementing principals of implementing as a member of the PEFC in November 2002.  3 <sup>rd</sup> para, 1 <sup>st</sup> , 5 <sup>th</sup> & acquired PEFC of the dot point has a template than 'principals of interesting choice of wording – I would expect that it was 'PEFC Estonia was admitted or endorsed as a member of the PEFC in November 2002.  • Address • Add		23	
principals of implementing Estonia was admitted or endorsed as a member of the PEFC in November 2002.  3rd para, PEFC Estonia Need to close the quotation	principals of implementing Estonia was admitted or endorsed as a member of the PEFC in November 2002.  3 <sup>rd</sup> para, 1 <sup>st</sup> , 5 <sup>th</sup> & acquired PEFC Need to refer to the scheme being evaluated and not to a previous scheme as this report has been used as a template  principals of implementing Estonia was admitted or endorsed as a member of the PEFC in November 2002.  • Address Address Address evaluated and not to a previous scheme as this report has been used as a template		the than 'principals of'	<ul> <li>Addressed</li> </ul>
3 <sup>rd</sup> para,  1 <sup>st</sup> 5 <sup>th</sup> &   YEFC   Estonia   Need to close the quotation     Addressed     Addressed     Addressed     Addressed     Addressed     Addressed       Addressed       Addressed	1 <sup>st</sup> , 5 <sup>th</sup> & acquired PEFC Need to refer to the scheme being evaluated and not to a previous scheme as this report has been used as a template	principals implementi'	of would expect that Estonia was admitt as a member of November 2002.	it was 'PEFC ed or endorsed the PEFC in Addressed Addressed
1st 5 W   acquired PEFC   Need to refer to the scheme being   Addressed	6 <sup>th</sup> dot point evaluated and not to a previous scheme as this report has been used as a template	ı,   'PEFC E	<u> </u>	
A1	point scheme as this report has been used as a template			
	as a template	'		=
			_	it has been used
4 <sup>th</sup> para, As above	4 <sup>st</sup> para,   As above	١,	_	
i di	1 <sup>st</sup> dot ' EMSN to			

point		"promote the'		
pomi		'PEFC		
		Slovenia';		
		'SFCS'; 'SFCS"		
		Sircs, Sircs		
		'SFCS'		
<b>5</b> , 2 <sup>nd</sup>	ME	2 <sup>nd</sup> sentence	Isn't it the EFCS document	<ul> <li>Addressed</li> </ul>
para			compared to the PEFCC document	
		'PEFCC BOD	for conformance?	<ul> <li>Addressed</li> </ul>
Pg 23 4 <sup>th</sup> para		considered'	Why is the PEFCC involved in the	
			EFCS revision process?	<ul> <li>Addressed</li> </ul>
6 <sup>th</sup> para		' and PEFC	What of the PEFC International –	
		International.'	its requirements or its sustainability	<ul> <li>Addressed</li> </ul>
			benchmarks?	
.1		" invitations to	See comment for 3.2	<ul> <li>Addressed</li> </ul>
7 <sup>th</sup> para		join the working		
Pg 24		group through	Isn't it revise or review as there	<ul><li>Noted</li></ul>
oth		the'	must have been a forest	
8 <sup>th</sup> para		' was assigned	management standard if the scheme	<ul><li>Noted</li></ul>
(also 9 <sup>th</sup>		to develop the	was previously endorsed!	37 . 1
para)		' [twice]	Whys isn't PEFC EST Annex 11	■ Noted:
10 <sup>th</sup> para		( 1 ° 1 ·	being used as the basis for the	Does not
10 <sup>th</sup> &		'as defined in	EFCS revision?	translate
10 & 11 <sup>th</sup>		PEFC ST	Need to clarify which WG and	■ Addressed
		1001:2010	which standard.	<ul> <li>Addressed</li> </ul>
paras 11 <sup>th</sup> para		Standard Setting  - Requirements.	Presume its Estonian – need the	<ul> <li>Addressed</li> </ul>
12 <sup>th</sup> para		'On 5 February	English translation!	- Addressed
12 para		2012, the	Which WG?	■ Noted
		decision was	What was the discussion on – was it	Noted
		made by the WG		<ul> <li>Addressed</li> </ul>
		to make'	International standard?	Tiddlebbed
Table 1		' using the	This should be moved to the 5 <sup>th</sup>	<ul> <li>Addressed</li> </ul>
		loodusaeg	paragraph to start the discussion	
		national listserv	and not at the end of the discussion.	<ul><li>Noted</li></ul>
		,	Isn't Table 1 on Pg 10 – so is it	
		'The WG carried	Table 2?	<ul> <li>Addressed</li> </ul>
		out an'	Is it 'Milestones' rather than	
		'Following	'Procedures'?	<ul> <li>Addressed</li> </ul>
		discussion, an	Also, is the 'Estonian' scheme not	
Table 3		open vote was	the 'Slovenian' scheme	<ul><li>Noted</li></ul>
Pg 26		held.'	Formatting issues!	
16 <sup>th</sup> para		'(See Table 1 for	Which WG is it?	
Pg 27		Standard	Is it '2012' rather than '2010'?	<ul> <li>Addressed</li> </ul>
		Revision	Isn't this the forest management	
		Milestones).'	standard only?	<ul> <li>Addressed</li> </ul>
		TD 11 4	There were two WGs – is this the	- Addressed
		Table 1	membership on the forest	

	1		21 12		
		Heading in Table	management or of both?		
		1	Shouldn't it be of the EFCS		
			documentation?	■ Ad	dressed
		Rows 1-4		<b>-</b> A.1	لممممساء
		Use of 'WG'		• Au	dressed
		Last row in			
		Table 1 on Pg 25			
		Last row in			
		Table 1 –			
		'EFCS'			
		Heading in Table			
		3			
		Nonconformity			
		PEFC ST			
		1001:2010			
		Standard			
		Setting			
		Requirements			
1, $1$ to	ME		This information provided in these	<ul><li>Ad</li></ul>	dressed
3 <sup>rd</sup> paras			three paragraphs is really		
Pg 28			Background – insert a sub-heading?		
Pg 28 3 <sup>rd</sup> para		· area is	Does this belong to the State i.e. is	<ul> <li>No</li> </ul>	ted: Not
6		without	it government land by default – See	exp	plained
		ownership and	1 <sup>st</sup> para, Section 7		
Start of		its'	This commences discussion on the		
4 <sup>th</sup> para			forest management standard – so	<ul> <li>Ad</li> </ul>	dressed
			insert a sub-heading		
4 <sup>th</sup> para			Need to close the quotation marks!	<ul> <li>Ad</li> </ul>	dressed
		" scheme is "to	Also, why go into a discussion of		
		contribute to the	the scheme when this section is		
		···	about the forest management		
5 <sup>th</sup> para			standard!	<ul> <li>Ad</li> </ul>	dressed
			'The following documents form the		
n d			basis of the PEFC Estonia Scheme:	<ul> <li>Ad</li> </ul>	dressed
2 <sup>nd</sup> dot		'• The	• Rio Convention on Biological'		
point		following	Maybe insert a link to Chart 1?	<ul> <li>Ad</li> </ul>	dressed
th		documents form			
6 <sup>th</sup> para		the basis of the	What is the significance of this	<ul> <li>Ad</li> </ul>	dressed
Pg 29		PEFC Estonia	statement in the context of the		
Chart 1		Scheme. Rio	forest management standard?		
_th		Convention on	Ratification Status of ILO	<ul> <li>Ad</li> </ul>	dressed
7 <sup>th</sup> para		Biological'	Conventions in Estonia		_
& Table		<ul> <li>International</li> </ul>	Referring to the same thing so why	<ul><li>No</li></ul>	ted
4		Labor	not use the same term for		
8 <sup>th</sup> para		Organization	consistency?		
10 <sup>th</sup> para		treaties	Is it PEFCC or PEFC International?		
Pg 30		'Estonia was	Shouldn't it be with PEFC EST		

	admittad int - 41-	CEM9	
	admitted into the European Union in May, 2004.' Estonia Ratification Status of ILO Conventions ' requirements' 'Components ' of the EFCS, PEFC has added' Nonconformity PEFC ST 1003:2010 Sustainable Forest Management	SFM?	
	Requirements		
ME	' forest owners two forms of forest certification' ' Certification as "the certification of forest' ' set of expectations for the group' ' voluntary process and landowners may enter'	See 3 <sup>rd</sup> para, 3.1 which indicates that there are three forms of forest certification! Need to close quotation marks Maybe it is 'requirements'? Maybe its 'forest owners' as dealing with forest certification!	<ul> <li>Noted</li> <li>Addressed</li> <li>Noted</li> <li>Addressed</li> </ul>
ME	' of the revised standard for' ' adopted PEFC ST 2002:2013,' ' with No Minor	Insert space between heading and 1 <sup>st</sup> para  Is this the translation otherwise it is poorly expressed! Is it the standard or is it the Scheme! For consistency with other references in the report, add in the title Is the underlining required? It's not on the other findings!	<ul> <li>Addressed</li> <li>Noted:         Word for         word from         the         document.</li> <li>Addressed</li> <li>Addressed</li> </ul>
		European Union in May, 2004.' Estonia Ratification Status of ILO Conventions ' requirements' 'Components ' of the EFCS, PEFC has added' Nonconformity PEFC ST 1003:2010 Sustainable Forest Management Requirements  ME ' forest owners two forms of forest certification' ' Certification as "the certification of forest' ' set of expectations for the group' ' voluntary process and landowners may enter'  ME  ' of the revised standard for  ME  ' of the revised standard for' ' adopted PEFC ST 2002:2013,' ' with No	European Union in May, 2004.' Estonia Ratification Status of ILO Conventions ' requirements' 'Components ' of the EFCS, PEFC has added' Nonconformity PEFC ST 1003:2010 Sustainable Forest Management Requirements  ME  ' forest owners two forms of forest certification' ' Certification as "the certification of forest' ' set of expectations for the group' ' voluntary process and landowners may enter'  ME  ME  Insert space between heading and 1st para  Is this the translation otherwise it is poorly expressed! Is it the standard or is it the Scheme! For consistency with other references in the report, add in the title Is the underlining required? It's not on the other findings!

		<b>s</b> identified.'		
9, 2 <sup>nd</sup> para Pg 34	ME	' in accordance to PEFC GD 1004:2009.'	For consistency with other references in the report, add in the title	
para, 4 <sup>th</sup> dot point Pg 35  3 <sup>rd</sup> para	ME	'• ISO Guide 65'  ' to the Estonian standard revision' [twice]	Isn't it ISO 17065? If the Scheme was submitted in 2014, ISO 17065 would have been operable as Guide 65 was withdrawn in 2012 even with the three year transition to ISO 17065 Isn't it the Scheme rather than the standard?	Noted: Scheme was submitted in 2013
6 <sup>th</sup> para		' for assessment and ISO Guide 66 has been replaced'  'Additionally, ISO Guide 17021 is being replaced with ISO 17065,'	Why is this mentioned when requirements only rely on ISO 17021 (1st para)? It was withdrawn on 31/08/2006! I don't believe ISO 17021 is a Guide! ISO 17021 is for management systems which is applicable to forest management while ISO 17065 is for product, processes & services which is applicable for CoC In the commentary, need to close the quotation marks	<ul><li>Noted</li><li>Addressed</li></ul>
para Pg 37 3 <sup>rd</sup> para  5 <sup>th</sup> para	ME	' establishes a commission and a panel commissioner.' '; 1.) a representative of the EMSN,' ' the dispute settlement body of impartial persons and the'	Does this mean three plus one?  Is this the panel commissioner?  I'm not sure that I follow this line of argument – if one on the commission is from the complainant side and one from the defendant side, it only leave the representative from EMSN as 'impartial' as most likely get the tied vote each time the commission considers a complaint/dispute.	<ul><li>Noted: Yes</li><li>Noted: Yes</li><li>Noted</li></ul>
Annex 1, 2 <sup>nd</sup> para Pg 38	ME	' the left documents the standard criteria.'	Isn't it the PEFC's requirements (or international sustainability benchmarks)?  This is OK for three columns. If	<ul><li>Addressed</li><li>Addressed</li></ul>

		Whole of	four columns, the 4 <sup>th</sup> is for	•	Noted
3 <sup>rd</sup> para		paragraph	Procedures or Process		110104
Puru		haragrap.	Have used 'Scheme' at the start of		Noted
5 <sup>th</sup> para		'certification	the assessment, so what is the term		
1		system'	for consistency?		
			Not all EFCS documents are		
		' citations	standards; maybe it should be		
		from the	'normative documents' – See 1.5		
		standard were			
		copied'			
Part 1	ME	' until a	Spelling – 'reached'	•	Addressed
4.1 e)		consensus is			
		reaches.'			
4.4 b)	ME	'EFCS process	No need to italicise the document	-	Addressed
Process		document	heading – see Pg 45		
		"Introduction to			
		Estonian Forest			
		Certification"			
		states,'			
4.6	ME	'This address is	Spelling – 'publicly'	•	Addressed
Procedur		publically			
es		available on their			
	2.55	website.'			
5.3	ME	'EST Annex 11,	There is no need for 'only' in this	-	Noted:
Procedur		Sect. 3: states	context!		Could not
es	3.65	only'			locate
5.3 b)	ME	'In an email	In what capacity of position was	•	Addressed:
Process		from Mart Kelk	Mart Kelk?		"Acknowle
F 2 d)	ME	'On 04.01.2010	In h) and a) it is 2012!	•	dgements"
5.3 d) Process	ME	a second'	In b) and c), it is 2012!	-	Addressed
5.3 e)	ME	On 26.03.2009	Did it reference the appropriate		Addressed
Process	IVIL	the EMNS'	documents?	_	Addressed
5.5 b)	ME	'EST Annex 11,	I presume that 'projects' could	_	Noted:
Procedur	IVIL	Sec. 7, IN 7.5, "	really be 'comments'?		That's how
es		Working groups	really be comments.		the
		shall'			Assessor
					interpreted
					it.
5.6 a)	ME	'On 20.02.2012	Is this via the EMSN web page?		Yes
Process		the public was			
		,			
5.6 c)	ME	' held from 20	These dates don't gel with the b)	•	Under
Process		February to 14	Process!		closer
		may 2012'	Spelling – 'May'		examinatio
		' mailing list	Spelling – 'the'		n the dates
		about <mark>eh</mark>			do work.
		commencement		-	Addressed
		of the public'		•	Addressed

5.6 d) Process	ME	' held from 20 February to 14 may 2012' '14.02.2014' and '14.05.2014'	Spelling – 'May' Is 2014 the correct year?	<ul><li>Addressed</li><li>Addressed</li></ul>
5.6 e) Process	ME	'EMSN working group submitted them.'	Is this part of a quote from EFCS documentation? If so, italics and quotation marks	<ul> <li>Quoted directly from submitted documents.</li> </ul>
5.9 c) Procedur es	ME	' the issue I handled by the Panel' ' by the Panel tha has a chairman and two members.'	Spelling – 'is' Spelling – 'that'	<ul><li>Addressed</li><li>Addressed</li></ul>
5.10 Process	ME	' PEFC Estonia which is home and repository'	What is meant by 'home'?	<ul> <li>Addressed</li> </ul>
5.11 Process	ME		Where is the EMSN BoD decision as per the PEFC requirement? If not, only partial conformity.	• The EMSN does not have a BoD and sends its WG recommend ation to adopt the forest manageme nt standard to EFCC.
5.12 Process	ME		There is no reference to the timing issue as per the PEFC requirement. If not, only partial conformity.	<ul> <li>Addressed</li> </ul>
6.1 to 6.4	ME		<ul> <li>Shouldn't these have a section or indicator or similar to be quoted to indicate the evidence for compliance?</li> <li>This just references the whole document!</li> <li>I agree that a procedure is in place for standard setting but these requirements seek specific references in the procedures to ensure compliance.</li> </ul>	■ Noted
Part II 4.1 d)	ME	' throughout PEFC EST	Is this the EFCS or is it the entity PEFC Estonia?	<ul> <li>PEFC EST</li> </ul>

		clearly show		
4.1.3	ME	' Chain of Custody, hereafter referred to as PEFC EST 2'	Underlined text isn't really required as the document is defined in 1.5 – just need to include the document identifier	■ Noted
4.1.4	ME	'a. No less than 1 forest hholding in case'	Spelling – 'holding'	■ Addressed
4.2.1 e) to i)	ME		Presume the document is PEFC EST 2 – needs to be included for clarity	■ Addressed
4.3.1 a) to d)	ME		Presume the document is PEFC EST 2 – needs to be included for clarity	<ul> <li>Addressed</li> </ul>
Part III 4.1 a)	ME	'The Standard clearly and precisely defines'  'PEFC National Forest Standard (EST SFMS) defines the following'	Need to provide the identifier to be consistent with other parts of the report ie PEFC EST SFM This identifier isn't used in 1.5 and is different to the one used in 3.3! Need a consistent identifier through the whole report.	■ Addressed
5.1.2	ME		Hasn't really set out the cycle and no mention of continuous improvement. What do the additional indicators actually convey as evidence for compliance?	■ Noted
5.1.3	ME	'Additional indicators include: IN 1.2.6.1,	Please include the text for evidence of compliance	
5.2.6	ME		How does it link to the management goals of the FMU?	Fire is regulated by national law and should a forest owner wish to implement fire as a tool, they must do so with government approval and supervision.
5.2.7	ME	'IN 3.1: "Forest manage shall implement'	Spelling – 'manager'	■ Addressed
5.2.7	ME	'Additionally	'Additionally, evidence provided	<ul> <li>Addressed</li> </ul>

5.3.4	ME	provided evidence (Copy of EST PEFC'  ' is regulated by the waste act'  ' IN 8.1: "If	[by whom] (Copy of EST PEFC' Also required for 5.2.8; 5.2.9; 5.4.6; 5.4.9; 5.4.12; 5.5.3; 5.5.4; 5.5.5 The year of enactment is usually included with the name of the Act (in capitals) to clarify it  Spelling – 'non'	<ul> <li>Addressed</li> <li>Noted: Not available to the Assessor</li> <li>Addressed</li> </ul>
		FOREST MANAGER also manages noon- wood resources,'		
5.4.1	ME	Additional indicators include IN 4.1, 4.2, 4.3, 4.5.	Need to be elaborated if used as evidence for compliance	
5.4.9	ME		Coppice is only an example and doesn't really require a formal response. The requirement seeks what is traditional in Estonia and its application within the forest management standard	Estonia has only been released from Soviet authority and control within the last 30 years. Such types of "traditions" were not promoted by the Soviets and there rarely exist. It will be up to the Estonians to rediscover these traditional methods or create new ones to incorporate into their SFM standard.
5.5.5	ME	' and is subject to planning'	What sort of planning?	The Assessor interprets this as local and regional planning processes.
5.6.4	ME	'These factors, in addition to CR 19.1 leads the Assessor'	Which factors are being relied on as only CR 19.1 is used for evidence! I don't believe it provides conformity.	■ Noted
5.6.5	ME	'IN 16.1:'	Is this 'everyman's right' as applicable to Europe?	Yes, the Assessor interprets this as

			What about IN 16.4 as evidence of	"every man's"
			compliance?	right.
5.6.10	ME		There is no conformity status for this requirement!	Noted: Forest management and
				its planning are all
				part of local and
				regional processes
				that allow for
				community
				stakeholder input
				in the process.
				Although not
				stated in the best
				English, the
				Assessor believes
				the point is made obvious with
				having to be in
				black and white.
5.7.1	ME	'Also, the legal.	'Also, the legal, customary and	
		Customary and	traditional rights'	
		traditional rights	Spelling – 'safe'	
		, '		
		'IN 18.3: "Working		
		conditions shall		
		be sage and		
		everyone,'		
5.7.2	ME	' to be in	Spelling – 'PEFC'	<ul> <li>Addressed</li> </ul>
		conformance to		
		the PEF		
		Standard.'		
Part IV	ME		Wouldn't a comment along the	<ul> <li>Addressed</li> </ul>
8			lines of 'The Assessor notes that	
			ISO 19011 covers this requirement' be applicable?	
12	ME		This evidence doesn't involve the	<ul> <li>Addressed</li> </ul>
12	IVIL		logo usage! I don't believe that	radiessed
			SFM principls cover logo usage as	
			a viable forest management action!	
Part VI	ME	'On 20	Spelling – 'Estonia'	<ul> <li>Addressed</li> </ul>
2		November, 2012		
		PEFC Estonian		
		adopted'		
3	ME	'Are complaint	There is text missing from here –	<ul><li>Noted</li></ul>
		and dispute	please insert the correct text.	
		procedures go		
		usage licenses		
		•••		

Suggested	edits to text	– revised text is in b	oold and deleted text in strikethrough		
<b>1.2</b> Step 6	ME	ME 'Submission for review and comment The Draft in both Microsoft Word and Adobe PDF delivered to PEFCC'  Submission for review and comment of The Draft, in both Microsoft Word and Adobe PI delivered to PEFCC'		•	Addressed
1 <sup>st</sup> Step 10	ME	'Adjustments to report from PEFCC TU and'	'Adjustments to report based on feedback from PEFCC TU and'	•	Addressed
2 <sup>nd</sup> Step 11	ME	'Present Final Report with BOD recommendation s to PEFCC'	'Present Final Report to PEFCC with recommendations for the BOD'	•	Addressed
<b>1.3.1</b> , 1 <sup>st</sup> para	ME	' with the EFCS documentation and available to the'	' with the EFCS documentation and was made available to the'	•	Addressed
<b>1.3.2</b> , 2 <sup>nd</sup> para	ME	' and was provided a 10- day response period.'	' and was provided with a 10-day response period.'	•	Addressed
<b>1.5</b> , 1 <sup>st</sup> para	ME	'The following is list of documents provided by PEFC Estonia to the PEFC	'The following is a list of documents provided by PEFC Estonia to the PEFC Secretariat for the conformity assessment to evaluate the EFCS for re-	•	Addressed
3 <sup>rd</sup> para, 1 <sup>st</sup> dot point 5 <sup>th</sup> para		Secretariat for conformity assessment to evaluate for reendorsement of the EFCS.' 'Estonian Forest Certification Council Application for the Estonian PEFC Certification Scheme' ' additional information, process and	endorsement of.'  'Estonian Forest Certification Council Application for the PEFC Estonian Forest Certification Scheme'  ' additional information, processes and documents'	•	Addressed

		documents'		
<b>3.1</b> , 1 <sup>st</sup>	ME	'The EMSN is	'The EMSN is not-for-profit	<ul> <li>Addressed</li> </ul>
para		not-for profit	organization established organized	
		organization	in'	<ul><li>Addressed</li></ul>
		organized in'	'EMSN is the national	
		'EMSN is the	administrative body having <b>as</b> a	
		national	purpose to promote a sustainable	<ul> <li>Addressed</li> </ul>
		administrative	'	
ord		body having a	' keeping it current with	<ul><li>Addressed</li></ul>
3 <sup>rd</sup> para		purpose to	compliance to the PEFC	
		promote a	requirements.'	
		sustainable'	'It is with the intent of the EMSN	
		' keeping it	' '	
		current with	Spelling – 'requirements'	
		PEFC		
		requirements.' 'It is with the		
		intent of the		
		EMSN'		
		' in		
		accordance with		
		requirments of		
		PEFC.'		
<b>3.2</b> , 1 <sup>st</sup>	ME	' Board of	' Board of Directors based on	<ul> <li>Addressed</li> </ul>
para		Directors, PEFC	PEFC EST Annex 11, Section 9	
		EST Annex 11,	and in guidance with guided by	
		Section 9 and in	PEFC ST'	<ul><li>Addressed</li></ul>
3 <sup>rd</sup> para		guidance with	'All interested parties were allowed	
th.		PEFC ST'	to participate on a WG.'	<ul><li>Addressed</li></ul>
5 <sup>th</sup> para		'All interested	'The public comment period closed	
		parties were	on 5 May 2012.'	
		allowed to		
		participate.'		
		'The public		
		comment period		
		closed 5 May 2012.		
<b>3.6</b> , 1 <sup>st</sup>	ME	'On 20	'On 20 November 2012, the EMNS	<ul><li>Addressed</li></ul>
para	17117	November, 2012	voted unanimously to adopt <b>in its</b>	- Audiesseu
թաս		the EMNS voted	entirety and without modification	
		unanimously to	PEFC ST 2001:2008 "PEFC Logo	
		adopt PEFC ST	Usage Rules – Requirements" was	
		2001:2008	adopted.'	
		"PEFC Logo	•	
		Usage Rules –		
		Requirements"		
		was adopted in		
		its entirety and		
		without		

		modification.'		
<b>3.7</b> , 1 <sup>st</sup> para	ME	'The dispute settlement body (Commission) is consists of three persons and a Chairman'	'The dispute settlement body (Commission) is consists of three persons and including a Chairman'	<ul> <li>Addressed</li> </ul>
<b>3.8</b> , 2 <sup>nd</sup> para	ME	'Documentation and requirements are thorough and current calling for'	'Documentation and requirements are thorough and currently calling for'	■ Addressed
4, 2 <sup>nd</sup> para 4 <sup>th</sup> para, 3 <sup>rd</sup> dot point	ME	'Following reaching consensus, they'	See changes above for 3.1 'Following <b>the WG</b> reaching consensus, they'	■ Addressed
5, 1 <sup>st</sup> para  2 <sup>nd</sup> para  3 <sup>rd</sup> para  5 <sup>th</sup> para  6 <sup>th</sup> para 8 <sup>th</sup> para 11 <sup>th</sup> para	ME	' emails, etc., are provided in a more detail in' ' setting process of the earlier mentioned documents' 'Please refer to Chapter 4 the involved parties of PEFC Estonia.' 'EFCS requirements;	' emails, etc., are is provided in a more detail in' ' setting process of the earlier previously mentioned documents' 'Please Refer to Chapter 4 the involved parties of PEFC Estonia for the EFCS revision process.' ' EFCS requirements; in PEFC EST'  See changes above for 3.2 ' elaborated to the WGs:' ' in Estonia from between 10 – 17 April. The public comment period closed on 5 May 2012.'	<ul> <li>Addressed</li> <li>Addressed</li> <li>Addressed</li> <li>Addressed</li> <li>Addressed</li> <li>Addressed</li> </ul>
		PEFC EST' ' elaborated to the WGs' ' in Estonia from 10 – 17 April. The public comment period closed 5 May 2012.'		
<b>6</b> , 1 <sup>st</sup> para	ME	'The most common stands are pine'	'The most common stands by dominant species are pine' 'in Europe based on its forest'	<ul><li>Addressed</li><li>Addressed</li></ul>
2 <sup>nd</sup> para 3 <sup>rd</sup> para		'in Europe based on forest '	Picea abies ' large holdings <b>held</b> by a single company."	<ul> <li>Addressed</li> </ul>

		Picea abies			Addressed
4 <sup>th</sup> para		' large	' managed in <del>and</del> <b>an</b>	_	Addressed
8 <sup>th</sup> para		_	_		
o para		holdings by a	internationally'		
		single company.'	' the revised standard was not to		
		' managed in	<del>be</del> required.'		
		and			
		internationally			
		' the revised			
		standard was not			
- st	2.55	to be required.'			
<b>7</b> , 1 <sup>st</sup>	ME	'Today Estonia	' <del>Today</del> Estonia has approximately	•	Addressed
para		has			
		approximately	'The rest of the Estonia's forests is		
		'	are owned by'		
		'The rest of the	' in an economic and efficient		
md.		Estonian forest is	method manner.'		
3 <sup>rd</sup> para		owned by'	'Forest Oowners having in excess		
41.		· in an	of 10 <del>,</del> 000 ha are not'		
5 <sup>th</sup> para,		economic and	'• Establishing the area which is		
1 <sup>st</sup> dot		efficient	considered as certified'		
point		method.'	'• Informs the group forest owners		
6 <sup>th</sup> dot		'Owner having	about the requirements of PEFC'		
point		in excess of	<ul><li>'• Informs forest owners found to</li></ul>		
		10,000 ha are not	be out of <b>non-</b> compliance with the		
8 <sup>th</sup> dot		···	Forest Management Standard'		
point		'• Establishing			
		the area which is			
		considered			
		certified'			
		'• Informs the			
		group forest			
		owners about the			
		requirement of			
		PEFC'			
		'• Informs forest			
		owners found to			
		be out of			
		compliance with			
		the Standard'			
<b>8</b> , 2 <sup>nd</sup>	ME	' Estonian	' Estonian Forest Certification		
para		Forest	Council to <b>ok</b> the decision to adopt		
1		Certification	,		
3 <sup>rd</sup> para		Council to the	· making obsolete PEFC <b>ST</b>		
l rum		decision to adopt	2002:2010.		
4 <sup>th</sup> para		, , , , , , , , , , , , , , , , , , ,			
r		· making	'of Custody Standard to by		
		obsolete PEFC	adopt <b>ing</b> completely and without		
		2002:2010'	'		
		2002.2010	•••		

		1, 2=		
o and		'of Custody Standard to adopt completely and without'		
9, 2 <sup>nd</sup> para	ME	' issuance of log using licenses are found in the document' ' may be granted by a regional or group representative to group'	' issuance of log using use licenses are found in the document' ' may be granted by a representative of a certified regional or group to group'	
10, 3 <sup>rd</sup> para	ME	'The EFCS call for certification bodies wishing' 'These were revised in the Estonian standard 05 July 2015.'	'The EFCS eall for requires that certification bodies wishing' 'These were revised in the Estonian standard on 05 July 2015.'	
para  2 <sup>nd</sup> para 3 <sup>rd</sup> para 4 <sup>th</sup> para	ME	' establishes a commission and a panel commissioner.'  'In case of a panel tie-vote, the' 'The three-person commission is consists of the' 'The Decision is considered final.'	' establishes a eCommission and a pPanel eCommissioner.' [As required in the rest of this section] 'In <b>the</b> case of a panel tied-vote, the' 'The three-person eCommission is consists of the' 'The Ddecision is considered final.'	
Annex 1, 5 <sup>th</sup> para	ME	'The beginning line of the reference starts with the attribution of the EFCS relevant document and section (e.g. PEFC EST IN 1.3.4).'	'The beginning opening line of the reference starts with the attribution of the relevant EFCS document and section (e.g. PEFC EST IN 1.3.4).' ' the findings in his own words, the citations'	

	' the findings in his words the citations'	



## Assessment of the Estonian Forest Certification Scheme - Panel of Experts review

## Mr. Hugh Martin

Report chapter / page	PoE member	Consultant's report statement	PoE member comment	Consultant's response
pp 5 & 9	HGM	EFCC EMSN	Abbreviations for the Estonian Forest Certification Council are given on p5 as EFCC and EMSN (derived from the Estonian). Both are used in the report and appear together in the same para on p9. Perhaps standardise on EMSN	Addressed
Pp 30 & 120	HGM	No mention of research	This observation is correct. However, from my knowledge of Estonia they are active in forest research and this feeds into management. The Estonians should be able to give an assurance about this.	Noted: Maybe this would be one of the conditions the PEFC BoD may place on PEFC Estonia.
Pp 36	HGM	'one a year'	Is this not more a problem of translation?	Noted: It is a problem with interpretation of "one a year" vs every 12 months.
P 90 5.1.4	HGM	No mention of the need to periodically update management plans	Is there a statement in the Estonian Scheme that management plans 'shall be periodically updated'. Perhaps it is in the law? At all events it should be confirmed here that this requirement is met.	Addressed
P 91 5.1.5	HGM	'Management plans or their equivalents shall include the average annual cut, including its justification' also 'where relevant the annually allowable	The evidence quoted does not seem to specifically address these issues. Perhaps they are subsumed in the statement that there should be 'Estimates and general plans of the volume of forestry works for at least 10 years' although this does not seem to be very specific. There are quotes elsewhere that may at least in part	Addressed

cover this, e.g. on p 92 under 5.1.9 it is exploitation of nontimber forest stated 'the forecast of the composition products'. and growing stock of the forest for at least 10 years' again on p 92 1.2.4 'Estimates and general plan of the volume of forestry works for at least 10 years' and then p 92 7.1 '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'. There is also likely to be requirements in the Estonian forest laws. At all events it would help here if rather more evidence could be presented to show that the Estonian Scheme fully covers the requirement for the assessment and maintenance of sustained yield of product.

## MINOR POINTS;

- On p 14 second para the first bullet point refers to 'Slovenia' and then in fifth and sixth bullet points the abbreviation is to SFCS rather than EFCS. The same reference to Slovenia appears in the first and fifth bullet points in the third para of p 21. References should, of course, be to Estonia and EFCS. **ADDRESSED**
- On pp 15 and 24 discussion is first about two working groups and then goes into the singular without specifying which WG is now being discussed. **ADDRESSED**
- P 17 second para line 6 'and' should read 'an'. **ADDRESSED**
- P 23 second para line six, wording needs to be tidied up to make sense. ASSESSOR COULD NOT LOCATE
- P 42 and on the placing of quotes from the scheme in italics is a good idea but sometimes has not been done, e.g. p 42 (f), p 44 4.3, p 51 4.6, p 60 (e), p 65 (c), p 73 5.10, p 78 (c), (e) & (f), p 79 4.1.2, p117 5.6.8, and perhaps elsewhere. **ADDRESSED**
- The is a variance between the figures given for % of private forests between p 28 and p 31, perhaps the higher value for area of private forests given on 31 refers to proportion of known ownerships. At all events there should be an explanation or conformity.
   ADDRESSED



## Conformity Assessment: Estonian Forest Certification Scheme

(final draft report) by GreenWoodGlobal Consulting, Ltd.,
Washington, DC Robert S. Simpson
Panel of Experts Review/Prof. Hans Kopp

The assessment is a comprehensive study based on the relevant documentation (desk study) and a questionnaire. There was no field visit, which obviously was not essential. I do agree with the assessor's recommendation to the BOD of PEFC and the minor non-conformities which were identified.

The language is clear and precise and does not need any interpretation – quite different to the Estonian Scheme itself.

I am pleased the assessor raised my permanent worry of language and grammar of the scheme. This certainly needs considerable improvements. I am aware that the assessor cannot correct the English in quotations but at least he points to the weaknesses.

Is there any hope that the Estonians at least try to improve their texts. National systems are publicly available (especially for PEFC's competitor) and should achieve a standard which can face criticism in terms of formal representation.

Prof. Dr. Hans Köpp

Report chapter/page	POE	Consultant's	POE member	Consultant's
	member	report statement	comment	response
p.13	Hans Köpp		A proposal of a time limit is missing to fulfil the conditions.	Addressed
p.18 centre of p.	cc .	Forest Base Products	Forest Base <u>d</u> Products	Addressed
p.19 4 <sup>th</sup> line	u	is consists of	<u>it</u> consists of	Could not locate due to reformatting
p.19 last line	ιι	doc. was not in English.	Certainly a major obstacle for the assessment!	Noted
p.24	ee	Estonian Mature Protection society	is it an umbrella organization, a big or a small one?	Unknown
p.26	u	ENGOs are mentioned	But cannot be identified in the list of the WGs	Noted
p.28 and 31	ii.	Figures mentioned	Are not identical (but confusing)	Addressed
p.28	ει	CBD is mentioned	But f.e. Washington Convention as species is missing	
p.68 bottom	"	w.g. was carried out	w.g. <u>has</u> carried out	Quoted from Estonian text
p.88 bottom	66	Last quotation	General paln should be corrected ingeneral plan (just one example)	Addressed
p.114 top	u	Again quotation unfortunately there are many others	Protected pars should be corrected inprotected parts	
p.117 bottom	is	In the scheme general recreation is missing (not only usage) IN 16,4	Not for the assessor it is stated on p.118(bottom)	Noted
p.128 No.17	44	N/A	I would prefer a NO because the scheme does not include additional requirement	Noted
p.134 No.9	66	If No, please explain	It should be: if YES, please explain (in this case)! Also in the original	Noted
p.135-142	u	Only in Estonian language	Not accessible for me	Noted
p.144.	и	Sebastien Genest	Are there really indigenous people in Estonia ??	PEFC Estonia comments there are no recognized indigenous people in Estonia.
p.145 last line	"	Representation of	Some final words are missing	This was how the comments were transmitted
p.146 6)	u	Kulosaari	What is K.? also p.150, an ENGO?	Unknown

p.146 last word	u	much of the	'The' should be deleted	It is how the document translated.
p.148 4.	ű	The Green Card system will	No proper information	Unknown
p.149 top	и	Not for the assessor	Very poor translation (language)	Noted
p.150	ű	Proposals, proposals for disc.	Delete one proposals	It is how the document translated
p. 151	и	Vote:all of the.	Some words are missing (not for the assessor)	Noted
p.152-169	í,	Only in Estonian language	Thus not accessible for me, may be of minor importance	Noted