



Questions and Answers

Revised PEFC Chain of Custody and PEFC Trademarks standards

During the recent webinars explaining the changes to the revised [PEFC Chain of Custody](#) and [PEFC Trademarks](#) standards the following questions were asked. This document provides the responses to those questions. For further information, please contact technical@pefc.org.

Does the PEFC CoC certify purity? Or at best it can be certified as originating from a SFM?

The term "pure" is intended to highlight material that has never been potentially mixed with material that is from controlled sources but not from PEFC certified forest. Proposals for alternative wording that is deemed more appropriate to express this are more than welcome in the public consultation.

Regarding DDS significant risk indicators - are the suggested main indicator sources to be considered sufficient (if they give a clear indication) or would further sources and corroboration be required?

It would be sufficient to do a risk assessment based on the indicators and sources referred to, unless the organisation has substantiated concerns (see clause 4) that the material originates in controversial sources and deems the indicator not to be sufficient to resolve these concerns. If, for example, an organisation has reason to suspect, or even outright knows, that material delivered by a supplier derives from a conversion meeting the definition of a "controversial source" (see clause 3.6), then simply ignoring this and only relying on the indicator provided in table 1 should not be deemed sufficient.

Agroforestry and trees outside forests - this has the potential for huge increase in non-timber forest products - or is certification of trees outside forests limited to the actual trees only?

The scope of PEFC trees outside forest certification may go beyond the trees and their timber only and cover non-wood forest products, such as fruit, nuts etc., if this is covered by the scope of the PEFC endorsed certification scheme/standard, certificate and management system.

Will each company be responsible for conducting its own risk assessment?

The responsibility to meet the requirements of the PEFC CoC standard, including the responsibility to implement the DDS and to conduct a risk assessment, lies with the certified organisation. Nevertheless, companies may utilise shared tools or information to do so.

In 3.6, how is the "spirit" of the ILO conventions expected to be interpreted?

The interpretation of what the "spirit" represents would need to be provided by the Chain of Custody Working Group.

Section 3.6.e shows "forest conversions" in bold. Does that mean it is a defined term elsewhere in section 3? If so, I don't see where it is listed as a defined term.

The term "forest conversion" as defined in the PEFC SFM benchmark standard (PEFC ST 1003) should be added under terms and definitions, i.e. *"Forest conversion - Direct human-induced change of forest to non-forest land or forest plantation.*

Note: Regeneration by planting or direct seeding and/or the human-induced promotion of natural seed sources, to the same dominant species as was harvested or other species that were present in the historical species mix is not considered a conversion"

Section 3.6, Table 2, item e, and the 2nd item "ii" under that, refers to "forest plantations." Is the term "forest plantations" defined anywhere?

The term "forest conversion" as defined in the PEFC SFM benchmark standard (PEFC ST 1003) should be added under terms and definitions, i.e. *"Forest plantation - Forest of introduced species, and in some cases native species, established through planting or seeding, mainly for production of wood or non-wood goods and services.*

Note 1: Includes all stands of introduced species established for production of wood or non-wood goods and services.

Note 2: May include areas of native species characterised by few species, intensive land preparation (e.g. cultivation), straight tree lines and/or even-aged stands.

Note 3: Application of the definition requires consideration of national forestry terminology and legal requirements."

A question as to the (new) CoC claims: Please correct me, there will be in future the following 3 claims possible?: 1) 100% PEFC certified (as it's in the current stdd) --> "mixing possible"; 2) I guess: "100% PEFC PURE" OR "PEFC PURE" --> exclusively for material coming directly from PEFC FM certified forests; 3) I guess: "100% PEFC Recycled" OR "PEFC Recycled" --> for products containing 100% recycled material

Yes, that is the proposal. Plus the "PEFC Controlled Sources" claim.

Can a certified and controlled sources claim be made as one statement, i.e. x% PEFC Certified and X-1% PEFC Controlled Sources.

Based on current proposal, it should be either "x% PEFC certified" or "PEFC Controlled Sources".

Sawmill residuals sold to a biomass producer. Sawdust could be 70% PEFC certified with the remainder 30% controlled sources. By making the claim for both certified and controlled it meets the requirement for the SBP scheme in a simple and straightforward manner.

The suggestion to allow for combined claims will be considered in the further development of the standard.

If a multisite organization with multiple like products in quality and input manages their account centrally, are the credits sourced at one site allowed to be sold at another site within the revised standard?

If the definition of "product group" and "equivalent input material" is met, yes.

Regarding the EPI: Is there a special ranking for "biodiversity & habitat" or do you refer to the general ranking of the EPI, covering all categories? Issue is, that a specific ranking can't be found in the annual report of the EPI? If you refer to the very specific "habitat and biodiversity" ranking, please provide a link.

The EPI does have a separate sub-indicator for "biodiversity and habitat", yes. See <https://epi.envirocenter.yale.edu/2018-epi-report/biodiversity-habitat>

For DDS, is it ok to have material with claim FSC CW or other FSC claim and see that as PEFC CS and therefore not need to use the whole DDS Appendix 1?

It is the responsibility of the organisation conducting the risk assessment to evaluate whether other certification schemes or verification mechanism sufficiently address controversial sources.

Regarding brokers, do you mean traders as well?

If the trader would want to mix certified and controlled material without having physical possession of the material, yes.

Regarding third party loggers, are they subject to follow the SFM in any way?

This is outside the scope of PEFC CoC certification. In forest areas under PEFC certified management, the certified manager needs to ensure that the requirements of the PEFC endorsed forest management standard is met by third party loggers. (See "General requirements" of PEFC ST 1003)

Question about the reinforcement of the link between SFM and CoC 1st transformation; how to reinforce link between CoC and SFM. Signed document between forester and 1st transformation?

The revised PEFC SFM benchmark standard requires that PEFC endorsed FM standards require certified forest owners/managers to use the official PEFC claim "x% PEFC certified" so that there is a closed link between FM and CoC.

Will the training material be updated for Trademark rules?

Yes

Do we need to change the Logo Use contracts (sign a new contract)? Can we wait until re-certification?

Contracts would only need to be changed if they don't refer to PEFC ST 2001 in their latest applicable transition. The transition period proposed for PEFC ST 2001 would also apply for PEFC ST 2002.

Trademark section: PEFC wordmark is shown as being a trademark only in the 'design' font. If in normal text, is it not considered as a trademark?

It would still be considered a trademark.

Do you have an example of an off product use?

Examples of "off-product" use are reference to the certified status of an organisation or information that a company has a procurement policy that specifies PEFC as acceptable input.

In how many countries the PEFC trademarks are registered? I think it is important that trademark are really registered and therefore are protected by law of the relevant country...

The PEFC trademarks are registered or in the process of being registered in all countries with PEFC NGB members, as well as in the vast majority of countries where there are currently no PEFC NGBs, but CoC certified license holders.

How should auditors can check if 99.9% of the fibres come from reclaimed sources in a PEFC certified product using a PEFC certified label?

The organisation needs to be able to demonstrate to the CB that the material in question actually meets PEFC ST 2001's definition of "recycled material".