



# **Assessment of the NCCF forest certification scheme (India) against the requirements of the PEFC Council**

**Final report, 9 January 2019**



# Woodmotion

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## Abbreviations

CIBART	Centre for Bamboo Resources and Technology
FME	Forest management enterprise
FMP	Forest management plan
FMU	Forest management unit
FPIC	Free, Prior and Informed Consent
FSC	Forest Stewardship Council
HCV	High conservation value
HCVF	High conservation value
IFCRE	Indian Council of Forestry Research and Education
IIFM	Indian Institute of Forest Management
ITTO	International Tropical Timber Organisation
MOEFCC	Ministry of Environment, Forest and Climate Change
NCCF	Network for Certification and Conservation of Forests
NABCB	National Accreditation Board for Certification Bodies
NGO	Non-governmental organisation
NTWPs	Non-timber forest products
OHS	Occupational Health and Safety
PEFC	Programme for the Endorsement of Forest Certification
SDG	Standards Development Group
SFM	Sustainable forest management
TWG	Technical Working Group
WWF	World Wide Fund for Nature

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## **1 Background**

NCCF – the Network for Certification and Conservation of Forests (here-in-after “the applicant”) has submitted its forest certification scheme (here-in-after “the scheme”) (see chapter 6) for mutual recognition and endorsement by the PEFC Council. Following the PEFC Council’s procedures identified in PEFC GD 1007:2017, the PEFC Council selected TJConsulting to carry out an independent and impartial assessment of the scheme documentation against the PEFC Council requirements.

## **2 Objective**

The objective of this assessment is to:

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

## **3 Impartiality claim**

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

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

## 4 Recommendation

Following the evaluation of the NCCF scheme against the PEFC Council's requirements, TJConsulting **recommends to the Board of Directors to endorse** the NCCF scheme<sup>1</sup> without further conditions.

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<sup>1</sup> It should be noted that the NCCF is currently developing other standards that will be applied in forestry or agro-forestry sector and that the NCCF is managing a certification system comprising of several certification schemes (within the terminology of ISO 17067). Therefore, the conclusions of this evaluation and the recommendations for the PEFC endorsement of this evaluation only apply to the submitted and evaluated documentation (See chapter 6).

## 5 Executive Summary

The assessment of the scheme, including evaluation of the scheme documentation and records; reviewing stakeholders' survey, interviewing key stakeholders and managers of the scheme resulted in the following conclusions that are organised according to the main parts of the PEFC Council requirements.

### 5.1 Standard setting procedures

The standard setting is governed by NCCF -STD- SSP- 01 /2015 (*Requirements for Standard Setting Process*) that is largely based on PEFC ST 1001:2010 and by NCCF -STD- DRP- 01 /2017 (*Procedures for complaints and appeals investigation and resolution*). The scheme's standard setting procedures **comply with** PEFC ST 1001:2010.

Details about the assessment and the scheme compliance can be found in chapter 8.2.2 and Annex A of this report.

The report also includes evaluation of the NCCF's standard setting procedures against the latest version of PEFC ST 1001 (2017). This assessment was specifically requested by the PEFC Council due to the fact that the development of the NCCF scheme overlapped with the revision of PEFC ST 1001. The results are presented in chapter 8.2.5 and Annex E of this report. However, it should be noted that the objective of this assessment is to provide the NCCF with a gap analysis to be considered in the next revision of the forest management standard. The findings and results of this assessment have no impact on the assessor's recommendation to endorse the scheme.

### 5.2 Standard setting process

The standard setting process lasted nearly three years from January 2015 until the formal launch of the forest management standard in January 2018. The process engaged a large number of stakeholders, was open and transparent and resulted in consensus amongst the participating stakeholders.

The standard setting process **complies with** the PEFC requirements (PEFC ST 1001:2010).

Details about the assessment and the scheme compliance can be found in chapter 8.2.3, 8.2.4 and Annex A of this report.

### 5.3 Group forest management certification

The scheme allows group certification as a certification model that is suitable to the small forest owners in India. The requirements for group certification are defined in NCCF -STD- GM- 01 /2017 (*Group Certification Standard*).

The scheme documentation for the group certification **complies** with the PEFC requirements (PEFC ST 1002).

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

#### 5.4 Sustainable forest management standard

The requirements for sustainable forest management are defined in NCCF -STD- FM- 01 /2017 (*Forest Management Certification Standard*).

NCCF -STD- FM- 01 /2017 is logically structured and the standard's concept is used consistently throughout the document. The document is of very high quality concerning its detail, consistency, usage of terms and references to external documentation. It includes detailed management system as well as performance-based requirements, its wording is unambiguous and allows the standard to be used for conformity assessment activities.

NCCF -STD- FM- 01 /2017 **complies** with the requirements of PEFC ST 1003.

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

#### 5.5 Chain of custody requirements

The applicant has formally adopted the PEFC International chain of custody standard (PEFC ST 2002) as a part of the scheme and as such **complies** with the PEFC requirements.

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

#### 5.6 Requirements for chain of custody certification bodies

The applicant has formally adopted the PEFC International requirements for chain of custody certification bodies (PEFC ST 2003) as a part of the scheme and as such **complies** with the PEFC requirements.

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

#### 5.7 Requirements for forest management certification bodies

The requirements for certification bodies for forest management certification are covered by NCCF -STD- ACR- 01 /2017 (*Accreditation and Certification Requirements for the CBs under NCCF FM Certification Scheme*).

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

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



## 6 Referenced documentation

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

**PEFC Council requirements:**

PEFC ST 1001:2010: Standard setting - Requirements

PEFC ST 1001:2017: Standard setting - Requirements

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

PEFC ST 1003:2010: Sustainable forest management – Requirements

PEFC ST 2001:2008 (second edition): PEFC Logo Usage Rules - Requirements

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

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

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

PEFC GD 1004:2009: Administration of PEFC scheme

PEFC GD 1005:2012: Issuance of the PEFC Logo Usage Licenses by the PEFC Council

PEFC GD 1007:2017 Endorsement and Mutual Recognition of National Systems and their Revision

Tender dossier            Call for proposals for the assessment of the NCCF forest certification scheme against the PEFC Council requirements

## The scheme's documentation

The assessment of the scheme was based on the following documentation provided by the PEFC Council on 26 June 2018 and its amended versions provided by the applicant and/or the PEFC Council during the assessment.

## Submitted scheme documentation

During the evaluation process, the NCCF revised some of the scheme documents. The evaluation, its findings and conclusions are based on versions of the documents indicated below.

NCCF -STD- DRP- 01 /2017	Procedures for complaints and appeals investigation and resolution (9/9/2017)
NCCF -STD- FM- 01 /2017	Forest Management Certification Standard (12/12/2018)
NCCF -STD- NCB- 01 /2017	Procedure for PEFC Notification of Certification Bodies Operating Forest Management System and Chain of Custody Certification (9/9/2017)
NCCF -STD- LOGO- 01 /2017	NCCF Logo usage requirements (15/3/2018)
NCCF -STD- SSP- 01 /2015	Requirements for Standard Setting Process (12/12/2018)
NCCF -STD- ACR- 01 /2017	Accreditation and Certification Requirements for the CBs under NCCF FM Certification Scheme (12/12/2018)
NCCF -STD- GM- 01 /2017	Group Certification Standard (12/12/2018)
PEFC ST 2001:2008, v2	PEFC Logo usage rules – Requirements
PEFC ST 2002:2013	Chain of custody of forest-based products – Requirements
PEFC ST 2003:2012	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

## Additional submitted documentation

- Application for PEFC endorsement
- PEFC Minimum Requirements Checklist
- Scheme development report
- NCCF Rules and Regulations
- NCCF Memorandum of Understanding

## Records on the standard setting process referenced in the assessment

(The references to the following records and evidences are made throughout the report)

- [1] NCCF's response to the assessor's request for additional information (August 2018)
- [2] E-mail correspondence between NCCF and members of the SDG concerning their nominations (May – June 2015)
- [3] A list of nominations for SDG membership
- [4] Stakeholder mapping document
- [5] Outreach project report 2016 – Summary
- [6] Outreach project report – full report, downloaded from <http://nccf.in/wp-content/uploads/2018/08/3Extended-Report.pdf>
- [7] Agenda for the international conference of 16 March 2015
- [8] List of participants of the international conference of 16 March 2015
- [9] Invitation letter to the international conference of 16 March 2015
- [10] Media coverage report on the international conference of 16 March 2015
- [11] E-mail invitation to the SDG meeting (3<sup>rd</sup>) of 7/5/2016
- [12] E-mail invitation to the SDG meeting (4<sup>th</sup>) of 20/8/2016
- [13] E-mail invitation to the TWG meeting (7<sup>th</sup>) of 5/12/2015
- [14] Post-meeting e-mail communication (TWG, 5/12/2015 meeting)
- [15] E-mail invitation to the TWG meeting (13<sup>th</sup>) of 23/9/2016
- [16] E-mail invitation to the TWG meeting (14<sup>th</sup>) of 16/12/2016
- [17] Minutes of the SDG meeting (3<sup>rd</sup>) of 7/5/2016
- [18] Minutes of the SDG meeting (4<sup>th</sup>) of 20/8/2016
- [19] Minutes of the TWG meeting (7<sup>th</sup>) of 5/12/2016
- [20] Minutes of the TWG meeting (13<sup>th</sup>) of 23/9/2016
- [21] Minutes of the TWG meeting (14<sup>th</sup>) of 16/12/2016
- [22] Post-meeting e-mail communication (SDG, 7/5/2016 meeting)
- [23] Post-meeting e-mail communication (SDG, 20/8/2016meeting)
- [24] Post-meeting e-mail communication (TWG, 23/9/2016 meeting)

- [25] Announcement of the stakeholders' consultation at the NCCF's website: <http://nccf.in/past-consultations/>
- [26] E-mail invitation to the stakeholders' consultation (5 October 2016), an example of e-mail sent out
- [27] A sample invitation letters to seminars in Bangalore, Odisha and Guwahati
- [28] Stakeholders' comments received during the standard development process
- [29] Report on pilot testing tour
- [30] Expression of Interest for performing the pilot testing
- [31] Checklists of the three pilot tests
- [32] Results of the pilot testing (Master sheet - Excel file) reviewed by the TWG (3/6/2017)
- [33] E-mail correspondence on the SDG's vote on the final draft of the forest management standard
- [34] Results of the SDG vote on the final draft (Excel sheet)
- [35] Minutes of the 12<sup>th</sup> meeting of the NCCF's Governing Body (9/9/2017)
- [36] Proceedings of the national conference on forest certification (13/1/2017)
- [37] Media coverage of the national conference on forest certification (13/1/2017)
- [38] E-mail invitation to consultation on Part A of the forest management standard (16/9/2015)
- [39] E-mail invitation to consultation on Part B, C of the forest management standard (15/12/2015)
- [40] E-mail invitation to consultation on Part D, E, F of the forest management standard (22/12/2015)
- [41] E-mail distribution of the complete forest management standard before the public consultation (26/09/2015)
- [42] Summary table of a number of stakeholders identified during the standard setting process
- [43] Minutes of the NCCF Governing Board of 23 January 2015
- [44] Membership of the SDG (including a date of joining the SDG)
- [45] Minutes of the SDG meeting – 20/5/2015
- [46] Minutes of the SDG meeting – 4/6/2015
- [47] Minutes of the SDG meeting – 25/8/2015
- [48] E-mail correspondence with WWF concerning OXFAM participation – 7/6/2015

- [49] Pilot testing - photographs of engagement with local communities
- [50] Minutes of the SDG meeting – 17/3/2015
- [51] Announcement of the public consultation at the NCCF's Facebook (7/10/2016)

## 7 Methodology and timetable

### 7.1 Scope of the assessment

The assessment was carried out based on PEFC GD 1007:2017, the PEFC Council's tender dossier of 26 June 2018 and the TJConsulting's tender proposal of 17 July 2018.

The assessment that resulted in the report was carried out as a desk-top exercise based on the documentation that was provided by the applicant as a part of its application for the PEFC endorsement and during the assessment process (see chapter 6). During the in-country visit the standard setting process was verified, and the non-conformities identified were followed up on.

It should be noted that the NCCF is currently developing additional certification standard, i.e. for "trees outside forests" or "non-wood forest products". The assessment and its findings only apply to the development of the submitted documentation and their compliance with the relevant PEFC requirements.

### 7.2 Assessment process

Table 1 describes the assessment process that is based on and fully conforms to PEFC GD 1007, the tender dossier of 26 June 2018 and the tender proposal of 17 July 2018.

Table 1: Stages of the assessment process

Stage	Description	Output	Time period
<b>Start of the assessment</b>	PEFC Council announced the start of the assessment process on 13 August 2018. Following the contractual documentation, TJConsulting provided the PEFC Council and the applicant with specific assessment deadlines.	The PEFC announcement on the commencement of the assessment	13 August 2018
<b>Public consultation</b>	The PEFC Council invited stakeholders to comment on the scheme	Stakeholders comments	4 July – 2 Sep 2018
<b>Stage 1 assessment</b>	The stage 1 assessment was based on the documentation referred to in the tender dossier and other documentation submitted before the start of the assessment. In addition, TJConsulting asked for and received from the applicant additional documentation and evidence (See chapter 6).  Stage 1 assessment also included distribution of the stakeholders' questionnaire and its analysis	Draft interim report	13 August - 10 Sep 2018 -
<b>Comment period</b>	The draft interim report was made available to the applicant and the PEFC Council for comments	Responses to the Interim report	10 Sep - 13 Dec 2018

<b>Visit to India</b>	Stakeholders' interview and clarification of non-conformities	Country visit report	26-29 Nov 2018
<b>Stage 2 assessment</b>	Evaluation of responses to the draft interim report and changes to the documentation	Draft final report	13 - 18 Dec 2018
<b>PEFC Council internal review</b>	The PEFC Council reviewed the final draft report and provided comments to the report	Comments from the PEFC Council	18 Dec 2018 – 4 Jan 2019
<b>Consideration of the PEFC Council's comments</b>	Consideration of the PEFC Council comments and amendments to the report	Final report	4 Jan 2019 – 9 Jan 2019

### 7.3 Classification of non-conformities

The assessment provides for three types of decision relating to the scheme conformity with the PEFC Council's requirements as indicated in chapter 6.2.2 of PEFC GD 1007:

- Major nonconformity:** The nonconformity against a specific PEFC requirement has a high impact on achieving the intended outcome of the PEFC Sustainability Benchmark.
- Minor nonconformity:** The nonconformity against a specific PEFC requirement has a low impact on achieving the intended outcome of the PEFC Sustainability Benchmark.
- Conformity:** A procedure described by the system documentation fully meets the particular requirement of the PEFC Sustainability Benchmark.

In addition to the conformity statements above, the report also includes "observations" that are, however, not causing non-conformities with the PEFC requirements.

## 8 Assessment

### 8.1 General analysis of the structure of the scheme

#### The scheme documentation

The scheme documentation contains seven (7) NCCF standards that have been developed by the NCCF and three (3) international PEFC Council standards that have been adopted by the NCCF.

NCCF -STD- DRP- 01 /2017	Procedures for complaints and appeals investigation and resolution
NCCF -STD- FM- 01 /2017	Forest Management Certification Standard
NCCF -STD- NCB- 01 /2017	Procedure for PEFC Notification of Certification Bodies Operating Forest Management System and Chain of Custody Certification
NCCF -STD- LOGO- 01 /2017	NCCF Logo usage requirements
NCCF -STD- SSP- 01 /2015	Requirements for Standard Setting Process
NCCF -STD- ACR- 01 /2017	Accreditation and Certification Requirements for the CBs under NCCF FM Certification Scheme
NCCF -STD- GM- 01 /2017	Group Certification Standard

PEFC ST 2001:2008, v2 <sup>2</sup>	PEFC Logo usage rules – Requirements
PEFC ST 2002:2013	Chain of custody of forest based products – Requirements
PEFC ST 2003:2012	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard

The scheme is logically structured following the requirements of the PEFC Council documentation. Each of the following processes are covered by a separate and distinct documentation:

- Standard setting (NCCF -STD- SSP- 01 /2015),
- Forest management (NCCF -STD- FM- 01 /2017)
- Group forest certification (NCCF -STD- GM- 01 /2017)
- Certification and accreditation (NCCF -STD- ACR- 01 /2017)
- Notification of certification bodies (NCCF -STD- NCB- 01 /2017)
- Dispute resolution (NCCF -STD- DRP- 01 /2017)

<sup>2</sup> The PEFC international documents PEFC ST 2001, PEFC ST 2002 and PEFC ST 2003 were adopted by the applicant on 5 September 2017 without modification.



## Organisational arrangement

The following bodies are involved in the development and implementation of the NCCF scheme. The scheme keeps strict separation of organisations involved in the scheme development and operations.

<b>The NCCF</b>	<p><b>The Standard setting body/the scheme owner</b></p> <ul style="list-style-type: none"> <li>- Develops and manages the NCCF scheme;</li> <li>- Notifies (formally recognises) the certification bodies;</li> <li>- Issues the PEFC Logo licenses in India.</li> </ul> <p>For the purposes of the development of the forest management standard, the NCCF forms the SDG and TWG.</p>
<b>Certification body</b>	<p><b>Certification bodies</b> are responsible for auditing of forest management and chain of custody and issuance of the certificates.</p> <p>The certification body is an independent third party that shall be accredited by an accreditation body that is a member of the IAF.</p>
<b>Accreditation body</b>	<p><b>The accreditation body</b> evaluates competencies and impartiality of the involved certification bodies and makes surveillance of their activities.</p> <p>The NCCF requires the accreditation body to be a signatory to the IAF multilateral agreement on product certification and explicitly specifies that the accreditation is provided by NABCB, the Indian national accreditation body.</p>
<b>Forest owner / management company / group of forest owners</b>	<p>Forest owners / managers are responsible to implement the forest management standard and comply with it.</p> <p>They are clients to the certification body and recipients of the forest management certificate.</p>
<b>Processing / trading companies</b>	<p>The companies are responsible to implement the chain of custody standard (PEFC ST 2002) and comply with it.</p> <p>They are clients to the certification body and recipients of the chain of custody certificate.</p>

## 8.2 Assessment of requirements for standard setting

### 8.2.1 Introduction and summary

#### History and objectives of the NCCF

Network for Certification and Conservation of Forests (NCCF) is a non-profit organisation, registered as a Society, to have a globally aligned certification program developed within India. NCCF is working towards developing national sustainability certification standards in diverse areas of natural resource management, majorly forestry, trees outside forests, protected areas and wetlands, non-wood forest products, quality planting material, ecotourism, biofuels, sustainable mining and water quality etc. and also engaged in policy advocacy and diverse conservation activities.

The NCCF has got support from the key forest based stakeholders such as the Ministry of Environment, Forest and Climate Change (MoEFCC) through its premier institutes like Indian Institute of Forest Management (IIFM), Indian Council for Forestry, Research and Education (ICFRE) and Indian Plywood Industries Research and Training Institutes (IPIRTI), Ministry of Agriculture and Farmers Welfare, Ministry of Commerce and Industry Export Promotions Council for Handicrafts (EPCH), ITC Ltd., Green Initiatives Certification & Inspection Agency (GICIA), Indian Paper manufacturers Association (IPMA), Greenply, Dabur, Arya Vaidyasala, Kottakal, Paper and Plywood Industries and many more in furtherance of its objectives.

#### Objectives of the NCCF:

- To develop National Standards for Sustainable Forest Management & Forest Certification that are compatible and conforming to the national statutes & legal framework
- To provide a platform for bringing together forest based stakeholders to promote forest and forest produce certification schemes for the long-term ecological security of forests
- To provide a link between responsible production and responsible consumption and help the consumer to make socially and environmentally sound buying decisions
- Promoting responsible trade in forestry sector and offering specific consideration to the unique needs of small and family forest owners
- To bridge the gap between policy makers and practitioners including entrepreneurs on issues that emerge on trade and other related aspects of the forest products and services through a series of consultation meetings, awareness raising, conferences and workshops etc.
- To promote skill development in the forestry sector in the interest of sustainable harvesting and utilization of forest produce as also to promote economic and social welfare of the labourers, plantation workers, artisans, workers engaged in processing of wood, NTFPs and manufacturing of paper, plywood, veneers, panels, furniture and forest-based handicrafts etc.

## 8.2.2 Assessment of the standard setting procedures

The NCCF's standard setting and revision process is primarily governed by NCCF STD SSP 01/2015 (Requirements for standard setting process) that is largely based on PEFC ST 1001:2010. The document refers to the development and revision of the NCCF's standards.

The document describes the NCCF as the standardisation body with the SDG (Standard Development Group) as the body with balanced representation of stakeholders that is responsible for building consensus.

### Procedures for the standard setting process

The standard setting procedures NCCF STD SSP 01/2015 are logically structured and follow the process approach defined in PEFC ST 1001:2010, it largely uses its structure and wording.

NCCF STD SSP 01/2015 includes procedural requirements for:

- Identification of stakeholders, including key and disadvantaged stakeholders, their constraints and means of resolving them;
- Announcement of the standard setting in media as well as by direct communication with stakeholders, providing information about the planned process and inviting stakeholders to submit their nominations to the Working Group;
- Establishment of the SDG and TWG (Technical Working Group);
- Development of the standard by the SDG;
- Two months public consultation announced in media as well as by direct communication to stakeholders, consideration of their comments and making summary of the comments and their consideration publicly available;
- Pilot testing;
- Decision making of the SDG and building consensus;
- Formal approval of the standard by the NCCF's Governing Body and its publication;
- Revision of the standard.

### Working group/committee for the development of the standard

NCCF STD SSP 01/2015 requires that the NCCF establishes the SDG (the Standard Development Group) based on nominations of relevant stakeholders and for its composition it makes reference to the stakeholder groups defined by the UN Agenda 21 and balanced representation of economic, social and environmental interests.

NCCF STD SSP 01/2015 does not define specific voting procedures or thresholds but refers to the general definition of consensus applied by ISO Guide 59. It requires to identify through voting or other means whether or not there is a sustained opposition of an SDG member and to resolve any apparent oppositions.

### Dispute settlement procedures

NCCF STD SSP 01/2015 makes reference to the NCCF's specific document on resolution of complaints and appeals (NCCF STD DRP 01/2017). This document provides comprehensive

procedures for the resolution of all complaints and appeals relating to the activities of the NCCF, including the standard setting.

Therefore, the NCCF's documentation includes procedures for

- Receipt of the complaint/appeal and communication to the complainant/appellant;
- Investigation and resolution of the complaint/appeal;
- Communication on the results of the complaint/appeal.

### **Results of the assessment**

NCCF STD SSP 01/2015 **fully complies** with PEFC ST 1001:2010.

For more information and detailed assessment, please refer to Annex A of the report.

### 8.2.3 Assessment of the standard setting process

#### Scope of the assessment

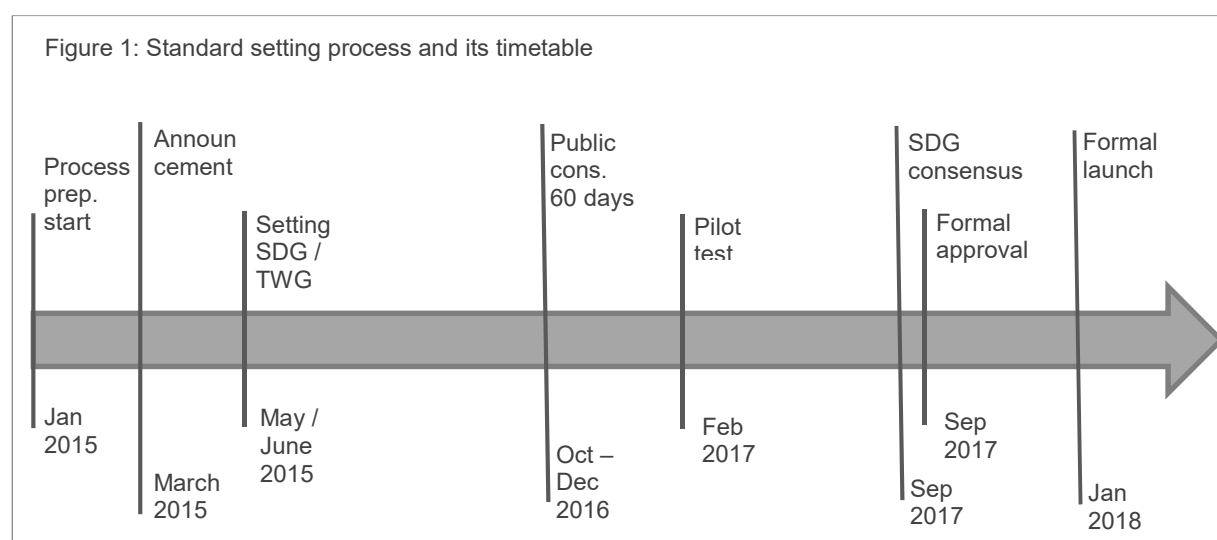
The scope of this assessment is focused on standard setting activities carried out during the period between January 2015 (establishment of the NCCF) and January 2018 (a formal launch of the forest management standard). However, it should be noted that the NCCF communication activities already started in 2014.

Following PEFC ST 1001:2010, the assessment is only focused on the development of the forest management standard (NCCF STD FM 1/2017). Development of other NCCF documentation and standards is out of the scope of this assessment<sup>3</sup>.

#### Standard setting process

The standard setting process was formally started by its announcement at the international conference held on 16 March 2015. However, already from January 2015, a group of stakeholders worked together to establish the NCCF as a non-for-profit organisation carried out preparatory activities necessary for the development of the standard. The process was completed by formal approval of the forest management standard (NCCF STD FM 1/2017) on 9 September 2017, respectively by its formal launch at the national conference held on 13 January 2018.

The stages of the process and its timetable is shown in figure 1 (2015-2018):



<sup>3</sup> It should be noted that the NCCF is developing other certification standards that are however not considered within this assessment.

## Stakeholders mapping

The NCCF carried out stakeholder mapping during January 2015 to March 2015 that resulted in the stakeholders mapping document<sup>[4]</sup> with a list of more than 500 stakeholders divided in several stakeholder groups, including government and ministries (48), business and industry (182), NGOs (159), scientific and technological community (66), women (16), workers and trade unions (4), others (29), state forest development companies (17), individuals (17) and NCCF members (23).

During April – June 2016, the NCCF carried out an extensive outreach project<sup>[5, 6]</sup> that was focused on engaging main (key and disadvantaged) stakeholders operating at the regional level. The outreach project also included detailed and comprehensive stakeholders mapping, definition of main stakeholder groups, selection of stakeholders for consultation and interviews, identification of critical topics and identification of prospectus stakeholders.

In addition, the NCCF also carried identified relevant stakeholders before each communication activity.

Both stakeholders mapping exercises, especially the second one carried out in 2016 comprehensively covered relevant stakeholder groups. The original 2015 stakeholders mapping exercise did not include identification of key and disadvantaged stakeholders. Identification of stakeholders for consultation and interviews within the 2016 outreach project (Appendix B of the outreach project report<sup>[5]</sup>) can be considered as identification of key and disadvantage stakeholders, especially as the project also considered stakeholders operating at the regional/state level. The outreach programme also identifies the main topics for each stakeholder groups as well as included direct consultations with individual stakeholders. This element would satisfy the PEFC requirement relating to the identification of constraints and actions addressing those.

The stakeholders mapping carried out in January / March 2015 did not explicitly identify key and disadvantaged stakeholders. However, the NCCF applied direct communication methods (e-mail/letters) for all identified stakeholders (PEFC requires the direct communication only to key and disadvantaged stakeholders). In addition, the NCCF carried out several activities to engage key and disadvantaged stakeholders that were not sufficiently represented in the SDG / TWG groups.

## Announcement of the standard setting process

The NCCF started communication with key stakeholders already in July 2014. The outcomes of this exercise were then considered by the NCCF's Governing Board in January 2015<sup>[43]</sup>.

The NCCF organised an International Conference in March 2015 that was announcing the development of the NCCF scheme, including the work of the SDG. The invitation for the March 2015 conference was circulated to a wide range of stakeholders (National and International) based on the stakeholder mapping list consisting of over 420 key stakeholders of all stakeholders' categories<sup>[42]</sup>. The invitation was disseminated through post and individual emails. The international seminar was also well covered by the media<sup>[10]</sup>.

During May – June 2015, the NCCF distributed by e-mail an "Expression of Interest" to a large number of stakeholders (670)<sup>[2, 42]</sup> inviting them to nominate their representatives to the SDG. The e-mail and post correspondence were verified during the in-country visit.

NCCF claims that information about the standard setting process, the establishment of the SDG as well as the international seminar (March 2015) were presented at the NCCF's website. However, the NCCF had changed its website during the process and its content in 2015 cannot be retrieved. Following the review of contracts with a website provider and

interview of stakeholders during the in-country visit, there is sufficient confidence that the NCCF website was operational in the beginning of the process (March – May 2015).

### **Working group for the development of SFM standard (SDG)**

The development of the forest management standard was led by the SDG. The SDG consisted of 22 people that covered the following stakeholder groups: business and industry (6); research (3), trade unions (2), environmental NGOs (3), social NGOs (2), accreditation and certification (1). In addition, the SDG also covers members that cannot be affiliated to a specific stakeholder group, i.e. formal state employees or representative of a consulting company. The composition of the SDG and TWG is presented in Annex E.

The SDG does not have a representative of the Indian Government. However, the SDG was affiliated with a group of 6 representatives of state forestry departments (“NODAL representatives”). In addition, two members of the SDG including its Chair, are formal senior officials of the Government. The composition of the SDG can be considered as well balanced, except missing representation of “local communities” and “indigenous/aboriginal peoples’ interests. However, it should be noted that several members of the SDG have direct experience with the local communities and also represented their interests. In addition, the NCCF made an effort to engage with the stakeholders representing local communities by directly approaching specific non-for-profit organisations, (ii) launching a stakeholder outreach programme, (iii) organising local workshops and (iv) focusing on local communities during the pilot testing.

The SDG has been established based on call for nominations that was made during the international seminar in 2015 and distributed by e-mail/letter to selected stakeholders in May 2015. The NCCF accepted all received nominations but the SDG’s composition was left open and the body was enlarged several times during the process by new stakeholders.

The SDG established a TWG that consisted of some SDG members and that was responsible for preparation of draft standard and intensive debate on the standard content, addressing comments of other SDG members, comments received from external stakeholders during public consultation and the outreach project and incorporating results of the pilot tests.

The first meeting of the SDG was on 17 March 2015 followed by additional 3 meetings until July 2017. The formal consensus was reached by a postal ballot organised in the beginning of September 2017. The TWG started its work on 13 March 2015 followed by additional 14 meetings until June 2017.

### **Open and transparent work of SDG**

The first meeting of the SDG was on 17 March 2015 followed by additional 3 meetings until July 2017. The formal consensus was reached by a postal ballot organised in the beginning of September 2017. The TWG started its work on 13 March 2015 followed by additional 14 meetings until June 2017.

The time period of 2 years provided to SDG/TWG to develop the forest management standard is considered as sufficient to develop the content of the standard, consider comments of different stakeholders within SDG/TWG, consider and address comments from public consultation and stakeholders outreach project, incorporate results of the pilot testing and finally build consensus within the SDG/TWG.

The management of the SDG / TWG was exemplary and on very high professional level due to strong engagement of the SDG Chair (Mr Varna) and professionalism of the NCCF staff supporting the SDG’s work. The meetings were announced in advanced and invitation were

distributed by e-mail together with agenda, minutes of the previous meetings and other supporting documentation. The SDG members had access to draft documentation through the NCCF's website and were actively encouraged to make comments to the draft standard and its parts. The debate of the meetings was recorded in very detailed manner and members had access to the minutes of the meetings shortly after the meetings.

### Public consultation

The NCCF carried out a formal public and stakeholders' consultation during the period from 3 October 2016 until 2 December 2016.

- The consultation was announced at the NCCF's official website<sup>[25]</sup>;
- The NCCF circulated the announcement by e-mail<sup>[26]</sup>;
- The NCCF carried out three workshops: on 25/10/2016 in Bangalore, on 8/11/2016 in Odisha and on 8/12/2016 in Guwahati<sup>[27]</sup>.
- In addition to the formal stakeholders' consultation, the NCCF carried out an extensive outreach project<sup>[5, 6]</sup> (April – June 2016) that was focused on engaging main (key and disadvantaged) stakeholders operating at the regional level. The outreach project included detailed and comprehensive stakeholders mapping, definition of main stakeholder groups, selection of stakeholders for consultation and interviews, identification of critical topics and identification of prospectus stakeholders.

### Pilot testing

The NCCF carried out pilot testing<sup>[29]</sup> of the draft forest management standard (version after the public consultation, V1.1) at three forest management units:

- Dandeli Forest Division, Karnataka (7 March – 10 March 2017)
- Nagaon Forest Division, Assam (20 March– 25 March 2017)
- Hoshangabad Forest Division, Madhya Pradesh (21 March – 25 March 2017)

The pilot testing was performed by personnel with experience in auditing of forest management that were selected by the NCCF based on open "Expression of Interest"<sup>[30]</sup>. As observers participated in the pilot testing representatives of IFCRE (Indian Council of Forestry Research and Education) and WWF<sup>[29]</sup>.

The results of the pilot testing had been reported<sup>[31]</sup> by the auditing team and reviewed by the TWG at its meeting held on 3 June 2017<sup>[32]</sup>.

### Approval of the standards by consensus (at the WG level)

The SDG voted on the final draft of the forest management standard using a postal ballot. An invitation to the postal ballot was sent out by e-mail on 30 August 2017<sup>[33]</sup>. 15 members of the SDG responded with an e-mail consent<sup>[33]</sup> on the final draft to be formally approved by the NCCF's Governing Body, 3 members provided the consent visiting the NCCF's office in person, 2 members provided the consent by telephone and 2 members did not vote as they left their organisation (WWF)<sup>[34]</sup>.

There is no evidence that any member of the SDG voted against or objected the formal approval of the standard.



### Formal approval of the SFM standard and its publication

The forest management standard was approved by members of the Governing Body of the NCCF on 9 September 2017<sup>[35]</sup>. The NCCF decided to officially launch the forest management standard (and the scheme) at the national conference held on 13 January 2018<sup>[36]</sup>. The conference was well attended by stakeholders, including senior officials of the government.

The event was well covered by national news media (5) as well as internet media (42)<sup>[37]</sup>.

The forest management standard as well as other NCCF's documentation was published at the NCCF's website (<http://www.nccf.in>).

The forest management standard was then revised during the evaluation process and formally approved by the NCCF's Governing Board on 12 December 2018 and immediately published at the NCCF's website.

### Results of the assessment

The NCCF's standard setting process **complies** with the PEFC requirements and in many areas exceeds the PEFC requirements. It succeeded in engaging a large number of stakeholders and resulted in a broad consensus amongst them. The process was managed and recorded on very high professional level.

### Observations to the standard setting process (not causing non-conformity with the PEFC requirements)

#### Decision making of the SDG

The SDG organized a postal ballot (by e-mail) on the consent to send the final draft for formal approval by the NCCF (August- September 2017)

The NCCF keeps the records of the SDG vote in a form of e-mail correspondence<sup>[33]</sup> and an Excel sheet with the results of the voting<sup>[34]</sup>. It should be noted that votes made "in-person" or "on the phone" are difficult to verify and the Excel sheet should be supported by the formal minutes prepared and signed by the SDG Chairman.

### 8.2.4 Stakeholders consultation

TJConsulting distributed a questionnaire to more than 500 stakeholders in India that covered all stakeholder groups relevant to sustainable forest management with a request to provide feedback on the standard setting/revision process of the NCCF scheme.

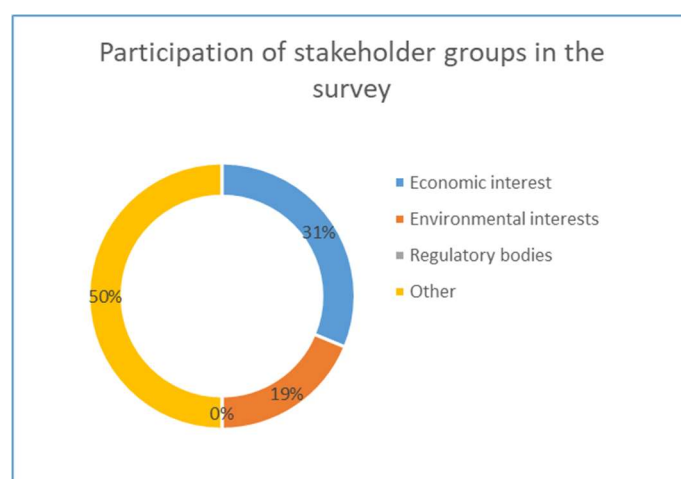
TJConsulting provided stakeholders with a four (4) weeks response period between 1 September 2018 and 30 September 2018 but also responses submitted after the deadline were considered. Also, responses made during face-to-face interviews as a part of the in-country visit were considered.

The results of the survey were taken into consideration in the scheme assessment. However, it should be noted that any interpretation of the survey results should take into consideration the limited number of received responses and the fact that the responses are not balanced according to stakeholders' categories.

The questionnaire used in the survey is shown in Annex H to this report.

#### Participation in the stakeholders' survey

16 respondents submitted their responses representing the main stakeholder groups.



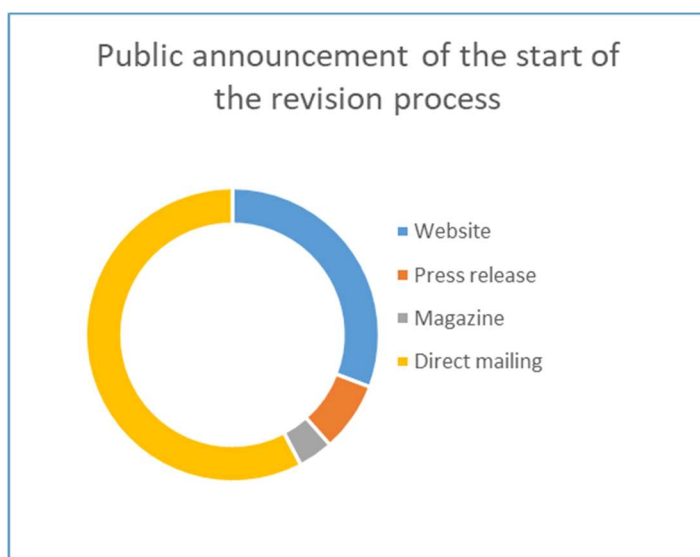
### Access to standard setting procedures

A majority of respondents (15) indicated that they had had an access to the NCCF's standard setting procedures.



### Public announcement of the start of the revision process

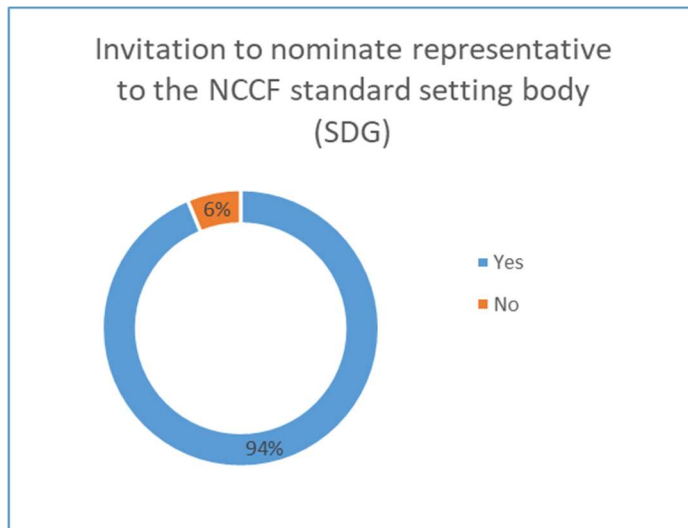
All respondents (16) responded that they have had noticed the public announcement of the start of the revision process. The website announcement and direct mailing were the most efficient means of communication (the respondents could make multiple choices).



### Invitation to nominate representatives to the Working Group

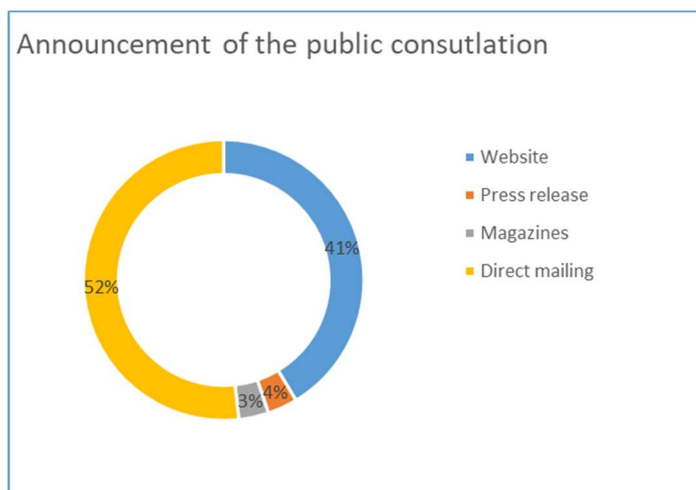
The majority responses (15) indicated in the questionnaire that they have had received an invitation to participate in the SDG responsible for the development of the NCCF Standard. One (1) respondent stated that it has received no invitation.

Twelve (12) respondents indicated that they have submitted their nomination and all (12) indicated that their nomination was accepted.



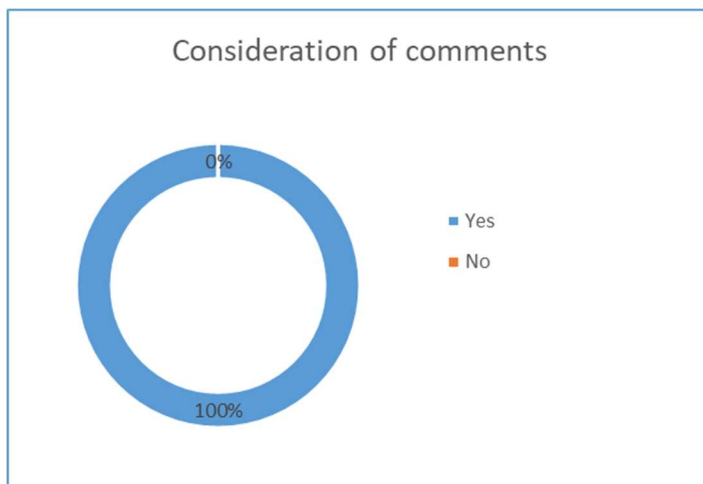
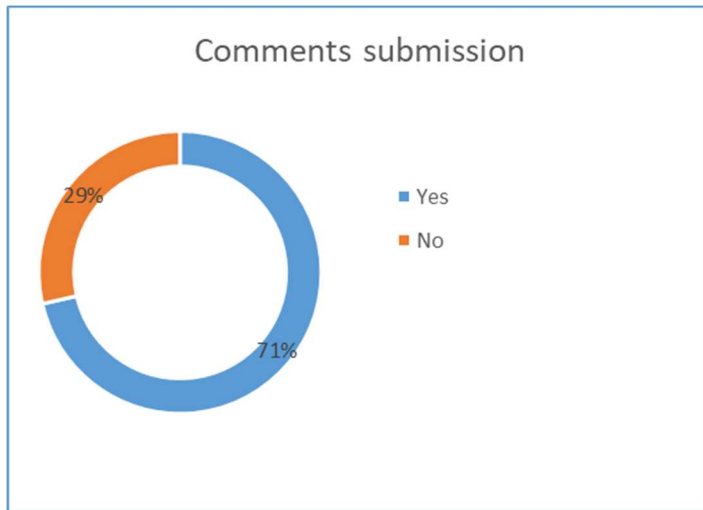
### Announcement of the public consultation

All respondents (16) indicated that they had noticed an announcement of the public consultation; website, press release and direct mailing were quoted as the main communication channel.



### Consideration of comments from public consultation

Ten (10) respondents indicated that they had submitted comments during the public consultation. All ten (10) also indicated that their comments have been considered.



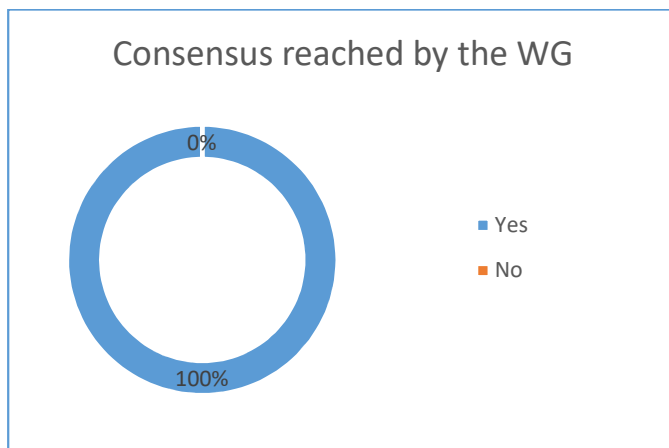
### Submission of complaints

All sixteen respondents (16) indicated that they had not submitted to the NCCF a complaint relating to the standard setting process.



### Open and transparent work of the Working Group and consensus reached by the Working Group

Twelve (12) respondents that have had participated in the SDG responded that its work had been open and transparent and that the SDG had reached consensus.



## 8.2.5 Evaluation of the NCCF standard setting procedures against PEFC ST 1001:2017

Following the tender dossier and the evaluation contract, the assessor's evaluation also includes conformity assessment of the applicant's standard setting procedures (NCCF-STD-SSP 1-2015) against the latest PEFC requirements for standard setting (PEFC ST 1001:2017).

The findings and conclusions relating to this assessment should serve as a gap analysis for the future review and revision of the NCCF scheme and the NCCF's standard setting procedures.

NCCF-STD-SSP 1-2015 largely complies with the new PEFC document, except the following areas that were added to PEFC ST 1001:2017 during the 2017 revision.

5.2.1	Documentary evidence
5.2.2	
5.3.1c	Complaints management – communication of the resolution process
6.1.1	Proposal for the development of a standard
6.1.2	
6.2.2	Stakeholder mapping
6.3.1b	Announcement of the start – reference to the “proposal”
6.4.3	WG – balanced representation
6.4.6	WG – decision making threshold
6.4.7	Resolution of sustained opposition
6.5.1 a, b, g	Public consultation
7.2.2	Main elements of approved standards
7.2.3	Availability of printed copies
8.2.1	Review of standards – feedback mechanism
8.2.2	
8.3.1	Review of standards – gap analysis
8.3.2	
8.4.1	Review of standards – stakeholders' consultation
8.4.2	
8.4.3	
8.4.4	
8.5.1	Review of standards – decision making
8.5.2	
8.5.3	
8.5.4	
9.1	Editorial revision
9.3.2	Time-critical revision
9.3.3	

## 8.3 Assessment of requirements for group forest management certification

### 8.3.1 Introduction

The NCCF scheme allows group certification as a certification model that is mainly suitable to the small forest ownership.

The requirements for the group certification are defined in NCCF STD GM 1/2017 “*Group certification standard*”.

The group certification model is based on a group of participants (forest owners) that is managed and controlled by a “group entity”. Concerning the requirements for the group entity and the participants, NCCF STD GM 1/2017 uses the structure of PEFC ST 1002.

In addition to requirements that are similar or identical with PEFC ST 1002, NCCF STD GM 1/2017 has separate chapters that detail the following topics:

- Group records (chapter 3);
- Group size (chapter 4);
- Internal monitoring requirements (chapter 7), including sampling methodology (chapter 8);
- Chain of Custody (chapter 9).

### 8.3.2 Group certification model

The approach, content as well as language for a number of requirements of NCCF STD GM 1/2017 concerning the group certification model is similar or identical with PEFC ST 1002.

The requirements for the **group entity** contain:

- a) Representation of the group organisation;
- b) Commitment on behalf of the group entity;
- c) Developing written procedures;
- d) Keeping records;
- e) Written agreement with group participants;
- f) Providing participants with confirmation on their participation;
- g) Providing participants with guidance and information;
- h) Operating an annual monitoring programme;
- i) Review of the group’s conformity, implementation of corrective and preventive measures.

The requirements for **participants** contain:

- a) Written commitment to comply with certification requirements;
- b) Compliance with SFM and other scheme requirements;
- c) Co-operation and assistance in the certification process;
- d) Implementation of corrective and preventive measures.

The document provides separate chapters (7 and 8) on the internal monitoring programme that includes annual audits of a sample of participants. The sample shall be defined separately for “structural category” (e.g. state-owned participants and private participants).



The sample for the structural category is then calculated based on size of the participants and a type of audit (certification/surveillance/re-certification) and uses a “proportion” of a number of participants (1.0 – 0.2) for bigger participants or a “square root” of a number of participants for smaller participants.

### **Results of the evaluation**

The NCCF requirements for group forest management certification (NCCF STD GM 1/2017) **comply** with the PEFC requirements (PEFC ST 1002).

### **Observations (not causing non-conformity with the PEFC requirements)**

### **Chapters numbering**

The NCCF made changes to the document as a response to non-conformities identified in the draft interim report. The NCCF has decided to delete chapter 5 but did not changed numbering of the subsequent chapters.

## **8.4 Assessment of the forest management standard**

### **8.4.1 Introduction and summary**

#### **History of the Standard**

Requirements for SFM of the NCCF scheme are included in NCCF STD FM 1/2017 (Forest Management Certification Standard) that includes mandatory requirements for forest owners/managers applying for forest certification at individual or group level.

When developing the SFM Standard, the NCCF acknowledged the work done by IIFM and ITTO in the field of forest certification in India through Bhopal India Process, and has also taken note of the Government Policies, Acts and Rules for the sustainable management of Forests enunciated primarily through National Working Plan Code 2014, and Forest Conservation Acts (1980) and Rules and similar numerous other initiatives.

## Structure of the Standard

Major issues relevant to forest certification have been grouped together into similar **Themes**. The Themes, as a fabric, have been developed by bringing together the various strands of major issues that are addressed among different forest certification standards globally and considering the National Working Plan code. These Themes are further organized into **Principles**, which are the building blocks of the standard. The Principles are further elaborated by means of various **Criteria** for evaluation, with each Criterion corresponding to an aspect of the Principle, with the whole Principle being more than the sum of its participant criteria. Further, **Indicators** have been developed for each criterion, to enable judging the performance in the field. There would be areas of overlap between the participant elements of the standard viz., Principles, Criteria and Indicators, across Themes. This overlap occurs as many elements of the standard would be overarching across different Themes, although it is endeavoured that the components of each Theme have distinct and common goals.

Principles		Criteria	No. of ind.
<b>THEME A: LEGALITY AND LAND TENURE</b>			
<p>The theme deals with the legal existence of the Forest Management Enterprise (FME) and the participating Forest Management Units (FMUs). Major issues covered in this theme include legality of the operations undertaken by the FME, compliance to national, state and local laws, regular payments of duties and levies, compliance to international agreements to which India is a signatory (CITES, ITTO, CBD Paris Agreement, UNCCD etc.), clear and documented ownership of forest lands along with rights. The theme also deals with responsibilities for ensuring legal compliance as well as resolution of disputes of ownership and rights. It also considers the nature, frequency and severity of regulatory violations and non-compliances and the way they have been addressed. Another important issue addressed is the availability of resources – human, financial and physical, to ensure compliance to relevant laws and statutes.</p>			
1.	Compliance to national, state and local laws and international treaties and regulations	1.1 Legal compliance	5
		1.2 Payment of taxes and fees	3
		1.3 International agreements	3
		1.4 Illegal activities of third parties	4
		1.5 Commitment	5
2.	Land Tenure, Rights and Responsibilities	2.1 long-term rights to the forest land	3
		2.2 customary/traditional tenure or rights of local communities	4
		2.3 Disputes over tenure claims and rights	3

Principles		Criteria	No. of ind.
<p align="center"><b>THEME B: FOREST MANAGEMENT PLAN</b></p> <p>The theme deals with the development and management of the forest operations in a Forest Management Enterprise (FME) in a defined management plan. Forest management planning needs to include practices for the sustainable management of forests and its biodiversity, encompassing the social, economic and ecological dimensions.</p> <p>Other issues addressed within the scope of this theme include, development of objectives of the management plan (silvicultural, socio-economic, environmental), periodic revisions of management plans, training of FMEs and workers in implementation of the management plans, establishment of monitoring and assessment protocols for implementation of plan (including type and intensity of monitoring), procedures for establishing Chain of Custody of forest products, public summary of results. The theme also addresses the resource allocation for plan development and monitoring &amp; evaluation and the extent of stakeholder input that has gone into plan development.</p>			
3.	Development and implementation of a Management Plan/Working Plan	3.1 Written management plan	4
		3.2 Capacity building	5
		3.3 Stakeholders consultation	2
		3.4 public availability of FMP	2
4.	Monitoring, Assessment and Review of management plan and its implementation	4.1 Monitoring of forest resources	3
		4.2 Monitoring of health and vitality	3
		4.3 The frequency and intensity of monitoring	4
		4.4 Chain of custody	3
		4.5. Periodic revision of management	3
		4.6 Public availability of monitoring	2

Principles		Criteria	No. of ind.
<b>THEME C: FOREST MANAGEMENT – IMPACTS AND EFFECTS</b>			
This Theme addresses issues related to the effects of various management activities on forest resources and the surrounding environment in which the Forest Management Enterprise (FME) is operating. This includes matters related to protection and conservation of soil and water resources which may be affected by management activities, assessment of forest resources to climate change vulnerability, resilience of the forests, adaptation and mitigation measures at the FME/FMU level, the social impact of forest management operations, and the impacts of climate change on forests ecosystems, and the potential of forest management activities.			
5.	Social, Economic and Environmental Impacts	5.1 Assessment of social, economic and environmental Impacts	4
		5.2 Addressing the impacts	4
		5.3 Protection of natural features, water and soil	6
		5.4 Protection of ecological functions	5
6.	Forests and Climate Change	6.1 Maintenance of carbon cycle	2
		6.2 Climate positive activities	3
		6.3 Alignment to State Action Plans on Climate Change (SAPCC)	4
		6.4 Validation and verification of carbon mitigation actions	3

Principles		Criteria	No. of ind.
<b>THEME D: SUSTAINABLE AND ECONOMIC UTILIZATION OF FOREST RESOURCES</b> The theme deals with the diverse and complete utilization of forest produce, the establishment and development of a robust local economy, with an emphasis on use of forest products and services, along with development of an inventory of the benefits associated with forests. Other issues addressed in this theme include optimal utilization of forest resources including all wood and non-wood products, minimizing wastage, use of local resources, value addition to benefit the local economy, sustainable extraction of NWFPs, traditional management systems and their integration into the FME.			
7.	Inventory and sustainable harvest regimes for forest resources	7.1 Inventory, survey and mapping of forest resources	3
		7.2 Volume of removable material	3
		7.3 Sustainable harvest	3
		7.4 Sustainable harvest of NTFPs	4
8.	Benefits from Forests	8.1 Sound and long-term economic viability	3
		8.2 Optimal utilization of forest resources	3
		8.3 Damage to forest resources	5
		8.4 Value of forest ecosystem functions, services and resources	4

Principles		Criteria	No. of ind.
<b>THEME E: SOCIALLY RESPONSIBLE FOREST MANAGEMENT - SOCIAL AND COMMUNITY RIGHTS AND RELATIONS</b>			
The theme deals with matters pertaining to rights, concessions and privileges, and issues related to tribals, local communities, forest dwellers and forest workers. It includes provisioning by the FME for a safe working environment, written policies and guidelines covering all aspects of workplace health and safety, training of forest workers in health and safety, and use of safety equipment. Other issues addressed by the theme include labour rights. Further, this theme also addresses the rights of local communities on the forest resource, along with utilization of these rights and use of their traditional knowledge after obtaining Free, Prior and Informed Consent (FPIC), and compensation for any inadvertent loss of or negative impacts which occur because of management activity.			
9.	Community rights and relations	9.1 Recognition of the rights of forest dwellers, tribals and other forest dependent communities	4
		9.2 Opportunities for employment, training and other social services	2
		9.3 Traditional forest-related knowledge	3
		9.4 Social impacts of management activities	4
		9.5 Damages to resources and rights of the local dependent population	6
		9.6 Sites of special cultural, spiritual, heritage, religious, ecological, or economic significance	4
10	Workers' rights – including permanent, temporary and contract workers	10.1 Compliance with health and safety legislation	7
		10.2 Compliance with ILO Conventions	4
		10.3 Workers rights	6
		10.4 Workers training	5

Principles	Criteria	No. of ind.
<p style="text-align: center;"><b>THEME F: ECOLOGICAL INTEGRITY AND HEALTH OF FORESTS– CONSERVATION AND MANAGEMENT</b></p> <p>The theme deals with issues of natural resource management and conservation of resources of high conservation and biodiversity values. This theme also looks at ecosystem health and vitality, and maintenance and conservation of diversity within the FME –at genetic, species, landscape and ecosystem levels, including protection of areas with high levels of species density or biodiversity, areas which serve critical ecological functions as well as areas serving as a cultural heritage to the local. The theme also considers various types of ecosystem services associated with a functioning forest, including provisioning services, regulatory services, cultural services and supporting services.</p>		
11	Ecology, biodiversity and Natural Resource Management – Conservation, Enhancement and Rehabilitation	11.1 Protection of natural features, biodiversity, water resources and soil
		10
		11.2 Impacts on biodiversity and ecological functions
		8
		11.3 Chemical pesticides and fertilizers use
		6
		11.4 Biological control agents
		3
		11.5 Exotic species
		6
		11.6 Forest conversion
		2
		11.7 Eligibility of plantations established by conversion for certification
		2
12	High Conservation Value Forests (HCVFs)/Special Sites for conservation	12.1 Identification and protection of HCVFs
		5
		12.2 Maintenance and/or enhancement of conservation attributes
		3
13	Forest ecosystem services	13.1 Identification and protection of ecosystem services and functions
		6
		13.2 Protection of soil and water resources
		6
14.	Biodiversity conservation - including measures for conservation and maintenance and rehabilitation of losses to biodiversity	14.1 Maintenance, conservation and enhancement of biological diversity
		7
		14.2 Rare, threatened, endemic and endangered species and their habitats
		3
		14.3 Monitoring of biodiversity values
		6



### 8.4.2 Assessment of the forest management standard

The NCCF forest management standard has been assessed against the PEFC Council requirements that are defined in PEFC ST 1003. The following “summary” description of the compliance includes description of the NCCF’s requirements in relation with key areas of sustainable forest management defined by PEFC ST 1003.

The detailed assessment of individual PEFC requirements, including assessment conclusion and justifications are included in Annex C to this report.

#### General requirements

##### General requirements

*PEFC ST 1003 requires that SFM requirements shall include management system and performance requirements (4.1a); be clear, objective based and auditable (4.1.b); apply to activities of all operators (4.1.c). It also requires records keeping (4.1d) and definition of responsibilities (5.1.8).*

NCCF STD FM 1/2017 includes both management system (e.g. planning, monitoring, etc.) and performance requirements (specific thresholds and verifiers); the requirements are clear and auditable.

The Standard applies to activities of all operators (3.2.5).

The Standard includes a number of requirements relating to keeping records: legal compliance (1.1.3, 1.2.3); land tenure conflicts (2.3.2); training (3.2.6, 10.4.2); harvest level (4.1.2); monitoring (4.3.2); NWFPs (7.4); complaints (9.1.4, 9.5.3); stakeholders engagements (9.4.3); OHS (10.1.4); ecologically important ecosystems (1.1); pesticides (11.3.3.8); exotic species (11.5.6); forest conversion (11.7.2). In addition, many requirements result in records without specific references, e.g. forest management planning.

Although the standard does not include a record keeping requirement that would cover all elements of SFM, the standard specifies records keeping for its critical elements.

#### Maintenance and appropriate enhancement of forest resources

##### Inventory, planning and mapping of forest resources

*PEFC ST 1003 requires inventory, planning, monitoring and evaluation cycle; evaluation of social, environmental and economic impacts and their avoidance (5.1.2, 5.1.3). It requires forest management plans, their content and public availability (5.1.4, 5.1.5, 5.1.6).*

NCCF STD FM 1/2017 does not explicitly require the continuous improvement cycle as required by the PEFC requirement. However, it includes very detailed requirements for the inventory of forest resources (7.1), preparation of forest management plan (Principle 3), monitoring activities (Principle 4) satisfy the objective of the requirement. Principle 5 and in particular 5.2 require assessment of social, environmental and economic impacts.

NCCF STD FM 1/2017 includes clear requirements for forest inventory (7.1) as well as mapping as a part of the forest management plans (Criterion 3.1).

NCCF STD FM 1/2017 includes very detailed requirements for forest management planning (3.1); defines the content of the FMPs; periodic revision (10 years) of the FMPs, as well as it refers to the

state or regional plans (for conservation purposes, 1.1.7). In addition, it requires stakeholders mapping and consultation during the process of the plan development.

NCCF STD FM 1/2017 requires a summary of forest management plan to be public, where possible in the local language and to up-date the public summary in case of major changes.

### Monitoring of forest resources

*PEFC ST 1003 requires periodic monitoring of forest resources (5.1.7)*

NCCF STD FM 1/2017 includes detailed and comprehensive requirements for monitoring of forest resources (Principle 4), including specification of topics to be monitored (4.1), intensity and frequency of the monitoring (4.3) and use of monitoring results in management planning and operation (4.5).

### Conversion of forests

*PEFC ST 1003 prohibits forest conversion to other use and conversion of primary forests to forest plantations, except in justified circumstances (5.1.11)*

NCCF STD FM 1/2017 includes requirements for both (i) restriction of conversion of natural forests and plantations to non-forest use and natural forests to forest plantations and (ii) eligibility of plantations established by conversion of natural forests.

The standard

- a) Makes mandatory reference to legislative requirements for forest conversion (Forest (Conservation) Act, 1980 (11.6) satisfying the PEFC requirement, bullet point a);
- b) Sets the scale of justifiable conversion to 0.5 % of the forest areas per year with cumulative limit of 5 % since 1994 (11.6) satisfying the PEFC requirement, bullet point b);
- c) Protects from any conversion the high conservation value forest areas, threatened ecosystems, culturally and socially significant areas, or important habitats of threatened species (11.6) satisfying the PEFC requirements, bullet point c);
- d) Requires contribution to long-term conservation, economic, and social benefits satisfying the PEFC requirements, bullet point c).

Concerning the eligibility of forest plantations to certification (Appendix 1 to PEFC ST 1003, interpretation to 5.1.11), the Standard only allows certification of those plantations established by conversion of natural forests (after 1994) where:

- a) the conversion was in compliance with the legislation and approved by the authorities (11.7.2);
- b) the conversion was limited in scale (no more than 5 % of the total forest area since 1994);
- c) clear, substantial, additional, secure long-term conservation benefits in the FMU are produced;
- d) the conversion does not occur within or damage or threaten high conservation value forest areas, threatened ecosystems, culturally and socially significant areas, or important habitats of threatened species.

## Maintenance of forest ecosystem health and vitality

### Monitoring of forest health

*PEFC ST 1003 requires monitoring of forest health and vitality and key biotic and abiotic factors (5.2.1, 5.2.2)*

NCCF STD FM 1/2017 includes comprehensive requirements for monitoring of health and vitality of forest resources, including key biotic and abiotic factors. The periodicity and intensity of the monitoring shall be defined based on the extent of forest resources but carried out at least once during the management planning cycle.

### Forest lighting

*PEFC ST 1003 prohibits forest lightening (5.2.6)*

The Standard does not explicitly require to avoid usage of fires as a management technique. However, it includes several requirements relating to the protection of forests against fires.

### Damages to forest resources

*PEFC ST 1003 requires minimization of damages to forest resources, trees and soil (5.2.7, 5.4.10, 5.5.3), avoidance of forest degradation (5.2.4); spillage of oil, disposal of waste in forests (5.2.7)*

NCCF STD FM 1/2017 includes comprehensive requirements relating to mitigation of risk of forest ecosystems degradation and damages to forest ecosystems caused by management activities (3.1, 5.2.3, 5.3.1, 5.3.2) and avoidance of negative impacts on soil (5.3.1, 5.3.3), water resources (5.3.3, 5.3.4, 5.3.5, 11.2.6) and biodiversity (14.3.5).

NCCF STD FM 1/2017 includes requirements for waste management and for prevention and control of chemical spillage (11.3.6).

### Pesticides and fertilizers use

*PEFC ST 1003 requires minimization of pesticides use (5.2.8); prohibits the use of WHO Type 1A and 1B, chlorinated hydrocarbons and other pesticides prohibited by the Stockholm Convention (5.2.9, 5.2.10); and their proper use. The use of fertilizers shall be minimized.*

NCCF STD FM 1/2017 requires an integrated pest management approach with controlled use of pesticides and clear objective of the pesticides use reduction (11.3, 11.3.1, and 11.3.2).

NCCF STD FM 1/2017 prohibits the use of the WHO 1A, 1B pesticides and other toxic pesticides, chlorinated hydrocarbons and pesticides banned by international agreement (the Stockholm Convention) (11.3.4).

NCCF STD FM 1/2017 requires safe and appropriate use of chemicals following the producers' instructions (11.3.3), and requires records keeping on the chemical use, and comprehensive requirements to training of employees (3.2.2, 10.4, 10.4.3).

## Maintenance and encouragement of productive of forests

### Sustainable production of forest products

*PEFC ST 1003 requires sustainable production of wood and non-wood products (5.3.1), balance between harvest and increment (5.3.6, 5.1.9) and level of growing stock (5.1.10).*

NCCF STD FM 1/2017 includes requirements for sustainable production of wood and non-wood forest products (7.3); sound long-term economic viability (8.1) and optimal use of forest resources (8.2).

NCCF STD FM 1/2017 includes detailed and comprehensive requirements for identification and calculation of sustainable harvest level (7.2) and enforcement of those limits (7.3). The requirements ensure that the sustainable level of growing stock is maintained (7.2.3).

The standard requires monitoring of forest inventory (4.1) as well as keeping records on harvest levels (4.1.2).

### Sound economic performance

*PEFC ST 1003 includes requirements for sound economic performance, possibilities of new markets and diversification of forest products (5.3.2, 5.3.3).*

NCCF STD FM 1/2017 requirements relating to the economic performance (8.1); economic viability in financial budgeting (8.1.1); investments (8.1.2) and review the economic performance (8.1.3). Although the provision relating to “alternative” markets is not of mandatory nature, it provides an intention for the forest management.

NCCF STD FM 1/2017 includes requirements relating to the optimal use of forest resources (8.2) and diversification of production of forest products (8.2.1, 8.2.3).

### Non-timber forest products

*PEFC ST 1003 requires sustainable production of non-timber forest products (5.3.7).*

NCCF TD FM 1/2017 includes requirements for sustainable harvest of non-timber forest products (7.3) as well as defines specific requirements for control of their commercial use such as written procedures and guidelines (7.4.1), keeping records (7.4.3) and monitoring and use of non-wood forest products.

### Forest infrastructure

*PEFC ST 1003 requires adequate forest infrastructure (5.3.8) and minimization of its impact on environment (5.3.3), ecosystems (5.4.11) and water resources (5.5.5).*

NCCF TD FM 1/2017 requires to have written guidelines for construction, maintenance and closure of roads and drains (13.2.6). Those activities shall take into consideration and minimise their impact on soil and water resources and the environment (5.3.1, 11.2.6, 13.2).

## Maintenance, conservation and appropriate enhancement of biological diversity

### Ecologically important forest areas

*PEFC ST 1003 requires identification and protection of ecologically important forest areas (5.4.2)*

NCCF TD FM 1/2017 includes requirements for protection of biological diversity at the ecosystem, species and genetic levels (5.4.2, 14.1) and written identification for this achieving this objective (14.1.1.).

NCCF TD FM 1/2017 has adopted a comprehensive approach of identification of High Conservation Values that is consistent with the PEFC requirement 5.4.2. The HCV definition in the referenced HCV Toolkit (12.1.2.b) as well as attributes specified in 12.1.1a cover all four bullet points (a-d) of PEFC ST 1003, 5.4.3.

In addition, the standard includes detailed requirements for engaging stakeholders in the HCV identification (12.1.2), public availability of information on the HCV (12.2.1), description and implementation of measures for protection and enhancement of the HCVs (12.2) based on the precautionary principle.

### Protected and endangered species

*PEFC ST 1003 requires protection of protected and endangered species (5.4.3)*

NCCF TD FM 1/2017 includes comprehensive requirements for protection of threatened or protected species and their habitats. The plan for identification and protection of the species shall be included in the FMP (3.1k), the areas with the species shall be identified as the HCVs (12.2.2 a), the presence of the species shall be identified within the FMU (14.2.1) and protected, including their habitats through conservation zones (14.2).

The standard ensures that the protected and threatened species are not commercially exploited.

### Forest regeneration

*PEFC ST 1003 requires successful regeneration with preference for natural regeneration (5.4.4); usage of suitable species (5.2.5, 5.2.7, 5.4.5) and controlled use of introduced species (5.4.5).*

NCCF STD FM 1/2017 requires the usage of natural structures and processes, the use of adequate species and structural diversity (14.3.4), requires timely and successful regeneration (5.4.5, 8.3.5) with suitable species (5.4.5) as well as protection of naturally occurring species (5.4.2, 5.4.3) and requires to use a mix of species provenances, clones, age classes and/or rotations in forest plantations (11.1.10). The monitoring of forest resources shall also include regeneration success (4.1a).

NCCF TD FM 1/2017 includes comprehensive requirements for the use of exotic (introduced species) (11.5) that prohibit the use of the exotic species in natural forests (11.5.1). In case of forest plantations, the exotic species can only be used after evaluation of their ecological impacts and review of scientific data (11.5.2, 11.5.3) and in a controlled manner (11.5.4), including monitoring of their impacts on the environment (11.5.5).

NCCF TD FM 1/2017 requires protection of ecological connectivity (5.4.4), areas of wildlife migration (11.1.5); restoration of ecological health by reforestation activities (11.1.8) and restoration of ecological functions and values in damages/degraded forests.

### Genetically modified organisms (GMOs)

*PEFC ST 1003 prohibits the use of GMOs (5.4.7)*

NCCF TD FM 1/2017 satisfies the requirement as it explicitly prohibits the use of genetically modified tree species (11.4.3).

The definition of genetically modified trees in chapter Glossary is identical with the PEFC definition in PEFC ST 1003.

### Forest structure

*PEFC ST 1003 includes requirements for natural diversified structures and processes (5.2.5, 5.4.8), restoration of ecological connectivity (5.4.6).*

NCCF TD FM 1/2017 requires protection of native biological diversity (14.1.2, 5.4.3), promotion of diversity by horizontal and vertical structures, uneven-aged stands and diversity of species (14.1.4), protection of wetlands (14.1.6), and a representative sample of existing ecosystems (11.1.3).

### Traditional management system

*PEFC ST 1003 includes requirements for promotion of traditional management systems (5.4.9).*

NCCF TD FM 1/2017 includes requirements promoting the traditional management systems (8.2.2) and documentation of the traditional knowledge of local communities and tribes (9.3.1).

### Balance of animal populations

*PEFC ST 1003 includes requirements for balance of pressure of animal populations and grazing (5.4.12).*

NCCF TD FM 1/2017 includes requirements for assessing the impact of grazing, identification of measures to avoid negative impacts of animal populations and overgrazing (3.1n) and requirements for monitoring of the overgrazing (11.1.7).

### Identification and protection of water resources

*PEFC ST 1003 includes requirements for water protective functions of forests for society (5.5.1), identification of those areas (5.5.2) and their protection (5.5.4).*

NCCF TD FM 1/2017 includes several requirements for protection of water resources by minimising negative impacts of forestry operations on water resources (5.3.3, 13.2.2), establishing of buffer zones around water sources (5.4.4, 5.4.5, 11.2.8, 13.2.2), protecting NHCV 4 (12.2.3), written guidelines for protection of water resources and water quality (13.2.1), and identification of all stream crossings (13.2.3).

## Maintenance of other socio-economic functions

### Contribution to local economy and rural development

*PEFC ST 1003 includes requirements for contribution to local economy, rural development, employment opportunities (5.6.1) and long-term health and well-being of communities.*

NCCF TD FM 1/2017 includes requirements for socio-economic functions, including rural development (8.2), employment (9.2.1, 9.2.2), environmental services (Principle 13), etc.

NCCF TD FM 1/2017 includes a number of requirements relating to various forest dweller groups, tribals and local communities, including their identification (9.1.1); employment opportunities (9.2, 9.2.1), training and other social services (9.2.1, 9.2.2) and their adaptation to climate change (6.3.2).

### Property and tenure rights

*PEFC ST 1003 includes requirements for identification, recognition and respect of property, tenure, traditional and customary rights (5.6.3).*

NCCF TD FM 1/2017 requires the FME to have clear and legally secure land use rights (2.1.1) and to identify and respect customary/traditional tenure or rights of local communities 2.2, 2.2.1).

### Indigenous people's rights

*PEFC ST 1003 includes requirements for recognition of indigenous people's rights (5.6.4).*

NCCF TD FM 1/2017 does not have specific requirements for indigenous/aboriginal people but provides requirements that are applicable to "local communities, tribals and forest dwellers". The term covers and is broader than the scope of the PEFC requirement 5.6.4.

NCCF TD FM 1/2017 makes neither reference to ILO 169 nor to the UN Declaration of the Rights of Indigenous People. However, the content of the Standard satisfies the PEFC requirement and the spirit of the international documents:

NCCF TD FM 1/2017 requires:

- identification the tribals, local communities, forest dwellers and/or other stakeholders with legal and/or customary/traditional rights (2.2.1, 9.1.1); recognition of their customary/traditional rights (9.1.2); including written commitment of the FME's top management (9.1.3);
- FME to demonstrate when it obtained the control over the customary/traditional rights in a manner authorised by law (2.2.2);
- Evidence of FPIC when customary rights have been allocated by local communities to other party (2.2.4);
- Resolution of conflicts over land tenure and rights through appropriate mechanisms (2.3.3), to be documented and resolved in priority manner (9.1.4);
- Forestry operations not to threaten or diminish rights of the tribals, local communities, forest dwellers (9.5.1); any apparent violation to be resolved (9.5.2); and recorded (9.5.3);
- Fair compensation for loss or damage to property, resources, livelihood or rights of local communities, tribals and forest dwellers (9.5.4, 9.5.5, 9.5.6), including an FPIC process.

### Public access to forests

*PEFC ST 1003 includes requirements for an adequate public access to forests (5.6.5)*

NCCF TD FM 1/2017 ensures access of indigenous/ local communities to their historical, spiritual sites, economic, recreational and cultural sites (9.6.4). It can also be expected that the traditional/customary rights of local communities/dwellers and tribals that are protected by the standard also include an access to forest resources.

In addition, the standard also requires to identify recreational, touristic and cultural values (13.1.1, 13.1.2). As those values are dependent on accessibility of the forests, the standard implicitly requires identification of areas with the public access and requires the forests to remain accessible.

### Historical, cultural and spiritual sites

*PEFC ST 1003 includes requirements for protection of special historical, cultural and spiritual sites (5.6.6)*

NCCF TD FM 1/2017 requires identification, protection and access to sites of cultural, ecological, recreational historical and spiritual significance (9.6).

### Recreational and aesthetic functions

*PEFC ST 1003 includes requirements for recreational and aesthetic functions of forests (5.6.7)*

NCCF TD FM 1/2017 requires to identify and document various socio-economic functions, including provisioning, regulating, cultural and supporting services (13.1.1, 13.1.2). The standard also makes an explicit reference to the identification of functions relating to “recreation and tourism” (13.1.1) and spiritual enrichment, cognitive development, reflexion, recreation and aesthetic experiences (13.2.2, cultural functions) and to mitigate threats to the continued existence of those functions (13.1.3).

### Employees training on SFM

*PEFC ST 1003 includes requirements for employees training on SFM (5.6.8)*

NCCF TD FM 1/2017 includes comprehensive and detailed requirements for capacity building and training of the FME staff and workers (3.2, 10.4) on implementation of FMP (3.2, 10.4) as well as the health and safety (10.4.3). The Standard requires to establish a training programme and keep appropriate records (3.2.4, 10.4.2).

The Standard also requires training for local communities (9.2, 10.4.4), including identification of needs for the training.

Although the training does not explicitly refer to training of contractors, the Standard requires to ensure that the work is done according to the FMP (3.2.5).



### Local communities, consultation, dispute settlement, local forest-related experience

*PEFC ST 1003 includes requirements for communication, consultation, dispute settlement (5.6.10) and usage of knowledge (5.6.9) of local communities.*

NCCF TD FM 1/2017 includes detailed and comprehensive requirements relating to local communities (including tribes and forest dwellers) that cover recognition of their customary and traditional rights (9.1); performing social impact assessment with the stakeholders' consultation following FPIC principles (9.4.3); resolution of any violation of their rights (including fair compensation); and requirements for resolution of complaints, conflicts and disputes (2.3, 9.1.4).

NCCF TD FM 1/2017 includes detailed and comprehensive requirements for training of local communities (9.2, 10.4.4), employment and social services (9.2), and the usage of local forest-related experience (9.3), including mechanism for fair compensation (9.3.3).

### Occupational health and safety

*PEFC ST 1003 includes requirements for occupational health and safety and management of associated risks (5.6.11, 5.6.12)*

NCCF TD FM 1/2017 includes comprehensive requirements relating to the OHS, including compliance with applicable laws (10.1, 10.1.a), identification of health and accident's risks (10.1.1c), safe working conditions and their improvement (10.1.1), consultation with workers, dissemination of information and training on OHS (10.1.1 d, 10.1.3, 10.4.3), OHS policies and guidelines (10.1.2), records keeping on OHS and injuries (10.1.4), safety equipment (10.1.5, 10.4.3), grievance mechanism for the OHS issues (10.1.6), and compensation in case of injuries (10.1.7).

### Labor rights

*PEFC ST 1003 requires compliance with the fundamental ILO Conventions (5.6.13).*

India has ratified 6 out of 8 fundamental ILO conventions (C029, C100, C105, C111, C138, C182)<sup>4</sup>. Two of the fundamental ILO conventions (C087 – Freedom of Association and Protection of the Right to Organise Convention, 1948) and C098 (Right to Organise and Collective Bargaining Convention, 1949) have not been ratified by India.

NCCF TD FM 1/2017 bases its requirements on the compliance with the Fundamental ILO Conventions (8) that are stipulated in the ILO's Declaration of Fundamental Principles and Rights at Work (1998) (10.2) and compliance with labour related legislation (10.2.2).

In addition to the referenced ILO Conventions and national legislation, the Standard makes explicit requirements for (i) grievances and disputes in labour issues (10.2.3, 10.2.4, 10.3.6); written guidelines for the labour related issues (10.3.1), non-discrimination the basis on caste, religion, gender, age etc (10.3.3); communication on the labour issues (10.3.2); child labour – minimum 14 years (10.3.4); and minimum wage (10.3.5).

<sup>4</sup>

[https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200\\_COUNTRY\\_ID:102691](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102691)

### Forest related research

*PEFC ST 1003 includes requirements for research-based forestry and support to research activities (5.6.14)*

NCCF TD FM 1/2017 requires to contribute to or support research activities relevant for the sustainable management of forest resources (4.5.3).

In addition, it makes references to the research or a scientific approach concerning capacity building and training (3.2); monitoring of forest resources (4.1.1, 14.3), definition of the buffer zones (5.3.4), and wildlife habitat management (14.1.5).

## Compliance with legal requirements

### Forest owner/manager's compliance with legal requirements

*PEFC ST 1003 includes requirements compliance with legal requirements (5.7.1).*

NCCF TD FM 1/2017 requires compliance with all applicable national, state and local laws relating to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land and resource rights for indigenous people and forest dependent communities; health, labour and safety issues; and payment of royalties and taxes (1.1, 1.1.2). The FME is required to have access to all the laws (1.1.1) and correct any apparent non-compliances (1.1.3, 1.1.4).

The standard also includes specific requirements to the payment of legally prescribed fees, royalties, taxes and other charges (1.2) and international agreements signed by India (1.3).

### Protection against illegal activities

*PEFC ST 1003 requires protection of forests against illegal activities of third parties (5.7.2).*

NCCF TD FM 1/2017 includes requirement for protection of forests against illegal activities of third parties (1.4), including documented commitment (1.4.1), appropriate resources (1.4.2) and resolution of any detected illegal or unauthorised activities.

## **Results of the assessment**

NCCF TD FM 1/2017 is of very high quality concerning its structure, well defined concept, consistency of requirements and their detail as well as low level of ambiguity. The Standard **complies** with PEFC ST 1003.

**Observations (Without an impact on the scheme's compliance with the PEFC requirements)**

## **Repetitions in the Standard**

Some topics (e.g. training, monitoring, impacts of forest management activities, etc.) and relating requirements are included under more Criteria or Themes. It is evident that the intention of the authors was to make the Themes “complete” and those repetitions are therefore necessary.

## 8.5 Assessment of the chain of custody requirements

The applicant has not submitted for the assessment and PEFC endorsement its own scheme specific chain of custody standard and its own, scheme specific requirements for chain of custody certification bodies. The PEFC endorsement application included the PEFC Council's international standards PEFC ST 2002 and PEFC ST 2003.

Therefore, the assessment of the chain of custody requirements is only focused on whether or not the applicant formally adopted PEFC ST 2002 as a part of its scheme and PEFC ST 2002 is mandatorily required to be used for the purposes of chain of custody certification.

- The applicant has not submitted evidence that the NCCF would formally adopt PEFC ST 2002 as a part of the NCCF scheme;
- PEFC ST 2002 is required in the notification procedures (NCCF STD NCB 1/2017). It requires (chapter 5.2) the certification body to only use PEFC ST 2002 as the applicable standard for chain of custody certification in India. The conditions of the notification of certification bodies as well as the specimen contract between the NCCF and the notified certification body (an Annex to NCCF STD NCB 1/2017) are mandatory, are enforceable, and have been approved by the NCCF Governing Body.

### Conclusion

The NCCF adopted the PEFC international standard for chain of custody (PEFC ST 2002:2013) indirectly through mandatory references in the notification procedures and in the notification contract (NCCF STD NCB 1/2017).

**The scheme satisfies the PEFC requirements for chain of custody.**

## 8.6 Assessment of requirements for certification bodies

### 8.6.1 Requirements for chain of custody certification bodies

The applicant's scheme has adopted the PEFC international chain of custody standard for the purposes of chain of custody certification (See chapter 8.5).

Therefore, the applicant is expected to also formally adopt the PEFC international requirements for chain of custody certification bodies (PEFC ST 2003) without any modifications. The applicant is not allowed to develop any scheme specific requirements for chain of custody certification bodies.

Therefore, the assessment is focused on:

- a) Formal adoption of PEFC ST 2003 by the applicant as a part of the scheme and a sole document with requirements for chain of custody certification bodies;
- b) Whether or not the applicant developed scheme specific requirements for chain of custody certification bodies.

#### Formal adoption of PEFC ST 2003

- The applicant has not submitted evidence that the NCCF would formally adopt PEFC ST 2003 as a part of the NCCF scheme;
- PEFC ST 2003 is required in the notification procedures (NCCF STD NCB 1/2017). It requires (chapter 5.2) the certification body to comply with PEFC ST 2003 as the only applicable standard for chain of custody certification bodies in India and to have PEFC ST 2003 included in the scope of their accreditation. The conditions of the notification of certification bodies as well as the specimen contract between the NCCF and the notified certification body (an Annex to NCCF STD NCB 1/2017) are mandatory, are enforceable, and have been approved by the NCCF Governing Body.
- NCCF STD ACB 1/2017 (*Accreditation and Certification Requirements for the CBs under NCCF FM Certification Scheme*) only includes requirements for forest management certification bodies.

#### Conclusion

The NCCF adopted the PEFC international standard PEFC ST 2003 indirectly through mandatory references in notification procedures and is also referenced in the notification contract. The NCCF scheme has not developed any scheme specific requirements for chain of custody certification bodies.

**The scheme satisfies the PEFC requirements for certification bodies operating chain of custody certification.**

## 8.6.2 Requirements for forest management certification bodies

### 8.6.2.1 Introduction and summary

#### Coverage and scope of requirements

The requirements for certification bodies for forest management certification are described in NCCF STD ACB 1/2017 (*Accreditation and Certification Requirements for the CBs under NCCF FM Certification Scheme*). The referenced document includes only requirements for certification bodies operating forest management certification.

#### Structure of the document (NCCF STD ACB 1/2107)

The document follows the structure of ISO 17065 and defines the NCCF's requirements using the same chapters as ISO 17065. This approach allows the users of the document to apply consistently requirements of ISO 17065 together with the NCCF's specific requirements for certification bodies operating NCCF forest management certification.

#### Certification and accreditation framework

NCCF STD ACB 1/2017 requires the certification bodies to comply with ISO 17065 and considers the NCCF forest management certification as "product certification".

NCCF STD ACB 1/2017 requires that the certification bodies shall be accredited by an accreditation body that is a signatory to the IAF multilateral agreement for product certification. At the same time, it specifies that the accreditation is provided by the NABCB, the Indian national accreditation body that is a member of the IAF.

It should be noted that the NCCF and the NABCB have already signed a memorandum relating to the development of an accreditation programme by the NABCB.

#### Competencies of the certification body and auditors

NCCF STD ACB 1/2017 includes requirements for competencies of auditors and audit team that are complying with and exceeding the PEFC requirements, including compliance with ISO 19011.

#### Stakeholders' consultation

NCCF STD ACB 1/2017 requires to carry out stakeholders' consultation as a part of the stage 1 of the certification audit.

#### Public availability of the certification report summary

NCCF STD ACB 1/2017 requires that the certification body prepares a summary of the certification report, submits it to the NCCF that makes it publicly available through its website.

#### Notification of certification bodies

NCCF STD ACB 1/2017 requires that the certification bodies shall be notified by the NCCF in order to issue forest management certificates that are recognised by the NCCF. The document also defines general conditions for obtaining the notification. NCCF STD NCB

1/2017 defines specific procedures for the issuance of the notification, including a notification contract.

### **Assessment conclusion**

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

## Annex A: Detailed assessment of the standard setting procedures and the standard setting process<sup>5</sup>

PEFC ST 1001:2010, 4.1		
4.1 The standardising body shall have written procedures for standard-setting activities describing:		
a) its status and structure, including a body responsible for consensus building (see 4.4) and for formal adoption of the standard (see 5.11),	Procedures	<p>Article 4 of NCCF STD SSP 01/2015 states that the NCCF is the standardisation body that supports and coordinates the development of the certification standards.</p> <p><b>Formal adoption of the standard:</b></p> <p>NCCF STD SSP 01/2015, chapter 5.11 states that the Governing Body of the NCCF is responsible for the formal approval of standards and technical documents.</p> <p>The composition and decision making of the NCCF's Governing Body is defined in the Rules and Regulations of the NCCF.</p> <p><b>Body responsible for consensus building</b></p> <p>NCCF STD SSP 01/2015, chapter 4.6 and 5.8 define the Standard Development Group (SDG) as the body consisting of stakeholders that is responsible for consensus building.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 defines both, a body for the consensus building as well as the body for the formal approval of standards.</p> <p>Detailed evaluation of the procedures for the consensus building and for the formal approval of the standard is described in detail under the PEFC requirements 5.8 – 5.9 and 5.11.</p>
b) the record-keeping procedures	Procedures	<p>NCCF STD SSP 01/2015, chapter 4.4 and Annex B define rules for keeping records as well as scope and public availability of the records:</p> <p>“4.4 The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 requires the keeping of records relating to the standard setting process.</p>

<sup>5</sup> The numbers in brackets [] identify referenced documentation as listed in chapter 6



c) the procedures for balanced representation of stakeholders,	Procedures	<p>NCCF STD SSP 01/2015, chapter 4.5, define composition of the SDG, chapters 5.8 and 5.9 define consensus building mechanism within the SDG.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 includes procedures for balanced representation of stakeholders.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p> <p>Detailed evaluation of the procedures for the balanced representation of stakeholders is described in detail under the PEFC requirement 4.4.</p>
d) the standard-setting process,	Procedures	<p>NCCF STD SSP 01/2015, chapter 5 includes procedures for the standard setting/revision process.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 includes procedures for the standard-setting process.</p> <p>Detailed evaluation of the procedures for the standard setting process is described in detail under the PEFC requirements 5.1-5.12.</p>
e) the mechanism for reaching consensus, and	Procedures	<p>NCCF STD SSP 01/2015, chapter 5.8 and 5.9 include procedures for consensus building within the SDG.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 includes procedures for reaching consensus.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p> <p>Detailed evaluation of the procedures for for the consensus building mechanism is described in detail under the PEFC requirements 5.8 – 5.9.</p>
f) revision of standards/normative documents.	Procedures	<p>NCCF STD SSP 01/2015, chapter 6 includes procedures for the revision of standards.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015, chapter 6 defines procedures for the revision of standards.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p> <p>Detailed evaluation of the procedures for the revision of is described in detail under the PEFC requirements 6.1 -6.4.</p>

**PEFC ST 1001:2010, 4.2**

4.2 The standardising body shall make its standard-setting procedures publicly available and shall regularly review its standard-setting procedures including consideration of comments from stakeholders.

Procedures	<p>NCCF STD SSP 01/2015, chapter 4.3 requires that “The NCCF shall make its standard-setting procedures publicly available”.</p> <p>Annex B of NCCF STD SSP 01/2015 requires that “All the documents that are required to be available publicly will be made available on the website of NCCF and upon request”.</p> <p>NCCF STD SSP 01/2015, chapter 6.3 states that “NCCF to ensure that the Requirements for Standard Setting Process NCCF -STD-SSP- 01 /2015 shall be revised in a timely manner prior to the initiation of the revision of the management standards or at interval that do not exceed a five-year period and as and when required”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement. The document Concerning the regular review of the standard setting procedures it is assumed that outlines that the standard setting procedures shall be reviewed prior to each revision.</p>
Process	<p>The scheme documentation including NCCF STD SSP 01/2015 is available at the NCCF's website (<a href="http://nccf.in/Forest-management-scheme%20.html">http://nccf.in/Forest-management-scheme%20.html</a>).</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The standard setting procedures are publicly available.</p>

**PEFC ST 1001:2010, 4.3**

4.3 The standardising body shall keep records relating to the standard-setting process providing evidence of compliance with the requirements of this document and the standardising body's own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request.

Procedures	<p>NCCF STD SSP 01/2015, chapter 4.4 requires that “The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request”.</p> <p>Annex B to NCCF STD SSP 01/2015 requires that “All the documents that are required to be available publicly will be made available on the website of NCCF and upon request”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 requires records keeping relevant to the standard setting process and requires the records to be kept for a minimum of five years and the records to be publicly available.</p>
Process	<p>As a part of the application for the PEFC endorsement and during the course of this assessment, a whole range of documents and records (see chapter 6) relating to</p>

	<p>the standard setting / revision process has been submitted by the applicant and assessed by the assessor.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The presentation of records as a part of the endorsement application as well as during this assessment provides sufficient evidence that the relevant records have been kept.</p>
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**PEFC ST 1001:2010, 4.4**

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

Procedures	<p>NCCF STD SSP 01/2015, chapter 4.5 includes procedures for establishment of the Standard Development Group (SDG) that is responsible for the development of the NCCF standard(s). The SDG can establish a Technical Working Group (TWG) to facilitate its working, for technical, regional or thematic requirements.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 defines and establishes a body (the SDG) responsible for the standard setting activities.</p>
Process	<p>According to the Development Report, the first meeting of the SDG was on 17 March 2015 followed by additional 3 meetings until July 2017.</p> <p>According to the Development Report, the first meeting of the TWG was on 13 March 2015 followed by additional 14 meetings until June 2017.</p> <p>The composition of the SDG and TWG is presented in Annex E.</p> <p><b>Compliance: Conformity</b></p>

**PEFC ST 1001:2010, 4.4 a**

4.4 a [The working group/committee shall]: be accessible to materially and directly affected stakeholders,

Procedures	<p>NCCF STD SSP 01/2015, chapter 4.5 states that the SDG shall “be accessible to materially and directly affected stakeholders”.</p> <p>NCCF STD SSP 01/2015, chapter 5.3 requires public announcement of the start of the standard setting process that shall include “an invitation to stakeholders to nominate their representative”.</p> <p>NCCF STD SSP 01/2015, chapter 5.4 states that “establish a standard development group or adjust the composition of an already existing standard development group, based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the standard development group and resources available for the standard-setting”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The term “accessible to all stakeholders” is interpreted as that a stakeholder organisation within or outside the membership of the standardisation organisation (i) has access to information about establishment of the to the committee/body responsible for building consensus and can make nomination to it,</p>
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	(ii) these nominations are considered and (iii) any appointment/refusal of the nomination is justifiable. NCCF STD SSP 01/2015 satisfies all three conditions.
Process	<p>Evidence relating to the open announcement of the process and participation:</p> <ul style="list-style-type: none"> <li>a) The NCCF started communication with key stakeholders already in 2014. The minutes of the NCCF's Governing Board from January 2015 make reference to mail communication with stakeholders of 27 July 2014<sup>[43]</sup>.</li> <li>b) The NCCF organised an International Conference in March 2015 that was announcing the development of the NCCF scheme, including the work of the SDG. The invitation for the March 2015 conference was circulated to a wide range of stakeholders (National and International) based on the stakeholder mapping list consisting of over 420 key stakeholders of all stakeholder categories<sup>[42]</sup>. The invitation was disseminated through post and individual emails. The e-mail and post correspondence were verified during the in-country visit. The international seminar was also well covered by the media<sup>[10]</sup>.</li> <li>c) During May – June 2015, the NCCF distributed by e-mail an “Expression of Interest” to a large number of stakeholders (670)<sup>[2, 42]</sup> inviting them to nominate their representatives to the SDG. The e-mail and post correspondence were verified during the in-country visit.</li> <li>d) Following the establishment of the SDG by June 2015, the NCCF decided to keep the SDG still open for additional stakeholders. Several members of the SDG joined the process during 2015 and 2016<sup>[44]</sup>. In addition, the NCCF was actively searching for representatives of state forestry departments as observers to the SDG and the development process<sup>[44]</sup>. E-mail correspondence between the NCCF and the state departments was verified during the in-country visit.</li> <li>e) NCCF claims that information about the standard setting process, the establishment of the SDG as well as the international seminar (March 2015) were presented at the NCCF's website. However, the NCCF had changed its website during the process and its content in 2015 cannot be retrieved. Following the review of contracts with a website provider and interview of stakeholders during the in-country visit, there is sufficient confidence that the NCCF website was operational in the beginning of the process (2015).</li> </ul> <p>Acceptance of received nominations:</p> <ul style="list-style-type: none"> <li>a) The submitted evidence includes a list of nominations<sup>[3]</sup> that have been received and accepted as well as those organisations that have declined the participation.</li> <li>b) The stakeholders' interviews made during the in-country visit confirm that all nominations to the SDG were accepted.</li> </ul> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The submitted documentation supported by the records reviewed during the in-country visit as well as stakeholders' interviews provide evidence that stakeholders had an open access to the SDG:</p> <ul style="list-style-type: none"> <li>a) the information about the process and the invitation to the SDG was made in public and reached a large number of stakeholders;</li> <li>b) all nominations received were accepted.</li> </ul>

PEFC ST 1001:2010, 4.4 b	
4.4 b [The working group/committee shall]: have balanced representation and decision-making by stakeholder categories relevant to the subject matter and geographical scope of the standard where single concerned interests shall not dominate nor be dominated in the process	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.5 states that the SDG shall:</p> <p>“Have balanced representation and decision-making by stakeholder categories. NCCF should take reference from the categories mentioned in the UN Agenda 21, relevant to the subject matter for balanced representation of stakeholders within the SDG in sectors of environment, economic, social (workers’ trade union, communities in and around forests, forest dwellers, tribals), certification bodies, forestry institutions, accreditation bodies and relevant government agencies where single concerned interests should not dominate nor be dominated in the process”.</p> <p>NCCF STD SSP 01/2015, chapter 5.8 and 5.9 include provisions for building consensus within the SDG and resolution of members objections.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 makes reference to UN Agenda 21’s definition of stakeholders and provides a list of stakeholders that are relevant to the sustainable forest management.</p>
Process	<p>The SDG consists of 22 people that cover the following stakeholder groups: business and industry (6); research (3), trade unions (2), environmental NGOs (3), social NGOs (2), accreditation and certification (1). In addition, the SDG also covers members that cannot be affiliated to a specific stakeholder group, i.e. formal state employees or representative of a consulting company. Stakeholders interviews made during the in-country visit confirmed that the interviewed stakeholders consider the SDG representation as well balanced.</p> <p>The SDG does not have a representative of the Indian Government. However, the SDG was affiliated with a group of 6 representatives of state forestry departments (“NODAL representatives”). In additional, two members of the SDG including its Chair, are formal senior officials of the Government.</p> <p>The local communities and people have been represented and covered in the process through participation of State forest departments, corporations, NGOs and Associations working with the local communities. Also, it the SDG Members, Mr. R C Khuntia and Mr. Kh. Devbrat, apart from directly representing the stakeholder category of workers and business also represented the interest of the indigenous/tribal people. WWF played a special role in providing contacts to organisations working with local communities<sup>[48]</sup>.</p> <p>The NCCF made specific effort to engage with additional stakeholders representing or working with local communities:</p> <ul style="list-style-type: none"> <li>a) During the in-country visit, e-mail correspondence with several organisations was verified: Self-employed Women Association – SEWA (8/5/2015, 2/6/2015), OXFAM (16, 19, 20, 27/6/2015), Centre for People’s Forestry (27/6/2015), Centre of Science and Environment – CSE (2/5/2015).</li> <li>b) Minutes of the SDG meetings<sup>[45, 46, 47]</sup> provide evidence that the SDG was discussing specific steps to engage more stakeholders, in particular local communities, including outcomes of those steps.</li> <li>c) The outreach programme of 2016<sup>[6]</sup> and pilot testing of 2016<sup>[29, 49]</sup> were also focused on reaching and engaging the local communities.</li> </ul>

	<p>Membership of the SDG is presented in Annex E.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The SDG covers economic, environmental as well as social interests in forest management.</p> <p>Although the SDG does not include a specific representative of local communities, the NCCF made sufficient effort to engage with those stakeholders during the whole standard setting process.</p>
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#### PEFC ST 1001:2010, 4.4 c

4.4c [The working group/committee shall]: include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants.

Procedures	<p>NCCF STD SSP 01/2015, chapter 4.4 states that the SDG shall:</p> <p>“Have balanced representation and decision-making by stakeholder categories. NCCF should take reference from the categories mentioned in the UN Agenda 21, relevant to the subject matter for balanced representation of stakeholders within the SDG in sectors of environment, economic, social (workers’ trade union, communities in and around forests, forest dwellers, tribals), certification bodies, forestry institutions, accreditation bodies and relevant government agencies where single concerned interests should not dominate nor be dominated in the process”.</p> <p>And</p> <p>“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”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The composition of the SDG provides for sufficient expertise in forest management and affected stakeholders, especially those with economic interest are well represented.</p>
Process	<p>The SDG consists of 22 people. All the SDG members have sufficient expertise in forest management. The SDG also includes a significant proportion of those stakeholders that are materially affected the forest certification: business and industry (6); trade unions (2), accreditation and certification (1).</p> <p>The SDG does not have a representative of the Indian Government. However, the SDG was affiliated with a group of 6 representatives of state forestry departments (“NODAL” representatives).</p> <p>Membership of the SDG is presented in Annex E.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The composition of the SDG provides for sufficient expertise in forest management and affected stakeholders are well represented.</p>

PEFC ST 1001:2010, 4.5	
4.5 The standardising body shall establish procedures for dealing with any substantive and procedural complaints relating to the standardising activities which are accessible to stakeholders.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 and NCCF DRP: 01/2017 include procedures for complaints resolution.</p>
Process	<p>The applicant has provided information that no complaint has been received. This claim was verified during stakeholders' interviews of the in-country visit.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> There is sufficient evidence that NCCF had not received any complaint during the standard setting process.</p>

PEFC ST 1001:2010, 4.5	
4.5a [Upon receipt of the complaint, the standard-setting body shall]: a) acknowledge receipt of the complaint to the complainant,	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p>NCCF DRP 01/2017, chapter 7.6 states that: "The ED shall acknowledge receipt of all disputes in writing after receiving the complaint and forward the same to the DRC".</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The referenced documents satisfy the requirement.</p>
Process	<p>The applicant has provided information that no complaint has been received. This claim was verified during stakeholders' interviews of the in-country visit.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> There is sufficient evidence that NCCF had not received any complaint during the standard setting process.</p>

4.5b [Upon receipt of the complaint, the standard-setting body shall]: b) gather and verify all necessary information to validate the complaint, impartially and objectively evaluate the subject matter of the complaint, and make a decision upon the complaint.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p>NCCF DRP 01/2017, chapter 7 includes procedures for investigation of the complaints by the Dispute Resolution Committee ensuring its impartiality.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The referenced documents satisfy the requirement.</p>
Process	<p>The applicant has provided information that no complaint has been received. This claim was verified during stakeholders' interviews of the in-country visit.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> There is sufficient evidence that NCCF had not received any complaint during the standard setting process.</p>

4.5 [Upon receipt of the complaint, the standard-setting body shall]: c) formally communicate the decision on the complaint and of the complaint handling process to the complainant.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p>NCCF DRP 01/2017, chapter 7.10: "The investigating authority shall record its decision which will be communicated by the NCCF secretariat to the complainant".</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The referenced documents satisfy the requirement.</p>
Process	<p>The applicant has provided information that no complaint has been received. This claim was verified during stakeholders' interviews of the in-country visit.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> There is sufficient evidence that NCCF had not received any complaint during the standard setting process.</p>

<b>PEFC ST 1001:2010, 4.6</b>	
4.6 The standardising body shall establish at least one contact point for enquiries and complaints relating to its standard-setting activities. The contact point shall be made easily available.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.7 states that "at least one contact point/person for enquiries and complaints relating to its standard-setting activities shall be established by NCCF".</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The referenced document satisfies the requirement.</p>



PEFC ST 1001:2010, 5.1	
5.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting work.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.1 states that: “The NCCF shall identify stakeholders relevant to the objectives and scope of the standard-setting work. In the case of forest management certification, all the relevant stakeholder groups shall represent the different aspects of sustainable forest management at national or sub-national/ regional level covering the social, economic, environmental interest groups and the relevant institutions and government agencies”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The document requires identification of stakeholders relevant to the standard setting.</p>
Process	<p>The Development Report states that the NCCF carried out stakeholder mapping during January 2015 to March 2015.</p> <p>The stakeholders mapping document<sup>[4]</sup> includes a list of more than 500 stakeholders divided in several stakeholder groups, including ministries (48), business and industry (182), NGOs (159), scientific and technological community (66), women (16), workers and trade unions (4), others (29), state forest development companies (17), individuals (17) and NCCF members (23).</p> <p>In addition, the NCCF updated the stakeholders mapping table during the process before each of the communication activity.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF carried out extensive stakeholders mapping resulting in a list with a huge number of stakeholders that are relevant to forest management.</p>

PEFC ST 1001:2010, 5.2	
5.2 The standardising body shall identify disadvantaged and key stakeholders. The standardising body shall address the constraints of their participation and proactively seek their participation and contribution in the standard-setting activities.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.2 states that: “The NCCF shall identify and classify disadvantaged and key stakeholders, their balanced representation. It shall also address the constraints of their involvement and proactively seek their participation and contribution in the standard-setting activities”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/20 satisfies the requirement concerning the key and disadvantaged stakeholders.</p>
Process	<p>The stakeholders mapping document<sup>[4]</sup> developed during January – March 2015 includes a large number of stakeholders divided according to stakeholder categories. However, the document does not identify which stakeholders are key and disadvantaged.</p> <p>During April – June 2016, the NCCF carried out an extensive outreach project<sup>[5, 6]</sup> that was focused on engaging main (key and disadvantaged) stakeholders operating at the regional level. The outreach project also included detailed and comprehensive stakeholders mapping, definition of main stakeholder groups,</p>

	<p>selection of stakeholders for consultation and interviews, identification of critical topics and identification of prospectus stakeholders.</p> <p>The NCCF as well as SDG made an effort to actively engage the key and disadvantaged stakeholders during the whole process by directly approaching all stakeholders identified in the stakeholders mapping<sup>[42]</sup> (also checked during the in-country visit), carried out and reviewed specific steps of engaging key and disadvantaged stakeholders<sup>[5, 45-47, 48]</sup>.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> Although the original stakeholders mapping exercise did not include identification of key and disadvantaged stakeholders, the NCCF directly communicated (emails-letters) with all identified stakeholders and made several active steps of their engagement.</p>
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### PEFC ST 1001:2010, 5.3

5.3 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation for participation in a timely manner on its website and in suitable media as appropriate to afford stakeholders an opportunity for meaningful contributions.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The NCCF shall make a public announcement for the commencement of the standard-setting process. NCCF shall also provide an opportunity to Stakeholders by sending them invitation for their participation in the standard setting process, in a time bound manner on the website and in suitable media. The announcement and invitation made for stakeholders shall include..."</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the PEFC requirement as it requires (i) the public announcement, (ii) made at the website and in suitable media and (iii) in timely manner.</p>
Process	<p>The NCCF started communication with key stakeholders already in 2014. The minutes of the NCCF's Governing Board from January 2015 make reference to mail communication with stakeholders of 27 July 2014<sup>[43]</sup>.</p> <p>The NCCF made the announcement of the start of the standard setting process through an international conference held on 16 March 2015.</p> <ul style="list-style-type: none"> <li>- The invitation to the March 2015 conference was circulated to a wide range of stakeholders (National and International) based on the stakeholder mapping list consisting of over 420 key stakeholders of all stakeholder categories<sup>[9, 42]</sup>. The invitation was disseminated through post and individual emails. The e-mail and post correspondence were verified during the in-country visit.</li> <li>- The conference was attended by 113 participants<sup>[8]</sup> of different stakeholder groups, including business and industry, research, trade unions, government, environmental NGOs, consulting companies, certification bodies, governmental and non-governmental institutions. The conference was also attended by representatives of the PEFC Council International and PEFC national schemes from Malaysia and China.</li> <li>- The conference covered<sup>[7]</sup> presentations on general aspects of forest certification, introduction to the PEFC Council, introduction to the NCCF initiative. The debate panels were focused on benefits of certification to forest management practices in India; case studies in other countries and demand for certified material.</li> </ul>

	<ul style="list-style-type: none"> <li>- The conference was reported in various media<sup>[10]</sup>, including radio, newspapers (4), all-India radio channel (1), and online internet media (23).</li> </ul> <p>NCCF claims that information about the standard setting process, the establishment of the SDG as well as the international seminar (March 2015) were presented at the NCCF's website. However, the NCCF had changed its website during the process and its content in 2015 cannot be retrieved. Following the review of contracts with a website provider and interview of stakeholders during the in-country visit, there is sufficient confidence that the NCCF website was operational in the beginning of the process (2015).</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The NCCF conference of 16 March 2015 made an announcement of the NCCF initiative and process. The event was well attended by stakeholders from different stakeholder groups and was well covered by media.</p> <p>There is sufficient evidence that the communication on the start of the standard setting process (e-mail, letters) reached a large number of stakeholders. Although the content of the NCCF's website of 2015 cannot be retrieved, indirect evidence provides sufficient evidence that the NCCF communicated the start of the standard setting process also through its website.</p>
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PEFC ST 1001:2010, 5.3	
5.3 [The announcement and invitation shall include:] a) information about the objectives, scope and the steps of the standard-setting process and its timetable	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (a) Objectives, scope and the steps of the standard-setting process and its probable timelines".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The announcement was made as a part of the international conference held on 16 March 2015.</p> <p>A part of the conference was also presentation on NCCF launch made by Mr. Suneel Pandey, Secretary, NCCF &amp; VP, ITC Ltd. <sup>[7]</sup>.</p> <p>The objective, scope and the steps of the standard setting process were also communicated as a part of the e-mail correspondence to a large number of stakeholders (670)<sup>[2, 42]</sup> and there is sufficient confidence that the information was also presented at the NCCF's website.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> It is expected that the presentation of Mr Pandey sufficiently covered information required by the PEFC requirement. The information was also distributed by direct communication (e-mail/letters) and presented at the NCCF's website.</p>

5.3 [The announcement and invitation shall include:] b) information about opportunities for stakeholders to participate in the process	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (b) opportunities for stakeholders to participate in the process</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The announcement was made as a part of the international conference held on 16 March 2015.</p> <p>A part of the conference was also presentation on NCCF launch made by Mr. Suneel Pandey, Secretary, NCCF &amp; VP, ITC Ltd.<sup>[7]</sup>.</p> <p>During May – June 2015, the NCCF distributed by e-mail an "Expression of Interest" to a large number of stakeholders (670)<sup>[2, 42]</sup> inviting them to nominate their representatives to the SDG and actively participate in the process. The e-mail and post correspondence were verified during the in-country visit.</p> <p>NCCF claims that information about the standard setting process, the establishment of the SDG as well as the international seminar (March 2015) were presented at the NCCF's website. However, the NCCF had changed its website during the process and its content in 2015 cannot be retrieved. Following the review of contracts with a website provider and interview of stakeholders during the in-country visit, there is sufficient confidence that the NCCF website was operational in the beginning of the process (2015).</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> It is expected that the presentation of Mr Pandey sufficiently covered information required by the PEFC requirement. The information was also distributed by direct communication (e-mail/letters) and presented at the NCCF's website.</p>

5.3 [The announcement and invitation shall include:] c) an invitation to stakeholders to nominate their representative(s) to the working group/committee. The invitation to disadvantaged and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is understandable,	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (c) an invitation to stakeholders to nominate their representative. 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".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The announcement was made as a part of the international conference held on 16 March 2015. A part of the conference was also presentation on the NCCF launch made by Mr. Suneel Pandey, Secretary, NCCF &amp; VP, ITC Ltd.<sup>[7]</sup>.</p> <p>During May – June 2015, the NCCF distributed by e-mail an "Expression of Interest" to a large number of stakeholders (670)<sup>[2, 42]</sup> inviting them to nominate their representatives to the SDG and actively participate in the process.</p> <p>NCCF claims that information about the standard setting process, the establishment of the SDG as well as the international seminar (March 2015) were presented at the NCCF's website. However, the NCCF had changed its website during the process</p>

	<p>and its content in 2015 cannot be retrieved. Following the review of contracts with a website provider and interview of stakeholders during the in-country visit, there is sufficient confidence that the NCCF website was operational in the beginning of the process (2015).</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> It is expected that the presentation of Mr Pandey sufficiently covered information required by the PEFC requirement. The information was also distributed by direct communication (e-mail/letters) and presented at the NCCF's website.</p>
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5.3 [The announcement and invitation shall include:] d) an invitation to comment on the scope and the standard-setting process	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (d) an invitation to comment on the scope and the standard-setting process".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The NCCF started communication with key stakeholders already in 2014. The minutes of the NCCF's Governing Board from January 2015 make reference to mail communication with stakeholders of 27 July 2014<sup>[43]</sup>. The minutes also refer to comments received from stakeholders and their consideration.</p> <p>The formal announcement was made as a part of the international conference held on 16 March 2015. A part of the conference was also 15 minutes presentation on the NCCF launch made by Mr. Suneel Pandey, Secretary, NCCF &amp; VP, ITC Ltd.<sup>[7]</sup>. The panel discussion during the conference was focused on (i) contribution of forest certification to forest practices in India and (ii) demand for certified products<sup>[7]</sup>. The stakeholders' interviews carried out during the in-country visit confirmed that the seminar also included discussion session.</p> <p>The SDG meeting organised after the international seminar (17/3/2018) considered outputs of the seminar and stakeholders' comments<sup>[50]</sup>.</p> <p>Following the stakeholders' input, the standard setting process was reviewed during the process itself. This resulted not only in extension of its duration but also in adding additional activities such as the outreach programme organised in 2016.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> Although there is no direct evidence that the NCCF would make an explicit invitation to stakeholders to submit their comments, the international seminar as well as the direct communication with stakeholders encouraged the stakeholders to comment on the suggested standard setting process.</p>
5.3 [The announcement and invitation shall include:] e) reference to publicly available standard-setting procedures.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (d) reference to publicly available standard-setting procedures".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>

Process	<p>The announcement was made as a part of the international conference held on 16 March 2015. A part of the conference was also 15 minutes presentation on the NCCF launch made by Mr. Suneel Pandey, Secretary, NCCF &amp; VP, ITC Ltd.<sup>[7]</sup>.</p> <p>The e-mail invitation (May – June 2015)<sup>[7]</sup> to participate in the SDG did not include reference to the publicly available standard setting procedures.</p> <p>NCCF claims that information about the standard setting process, the establishment of the SDG, the international seminar (March 2015) as well as the standard setting procedures were presented at the NCCF's website. However, the NCCF had changed its website during the process and its content in 2015 cannot be retrieved. Following the review of contracts with a website provider and interview of stakeholders during the in-country visit, there is sufficient confidence that the NCCF website was operational in the beginning of the process (2015). Taking into account the stakeholders' interview, the result of stakeholders' consultation questionnaire and very active and exhaustive use of the NCCF's website during the development of other NCCF's standard, there is high level of likelihood that the standard setting procedures were available from the NCCF's website.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> Although the NCCF cannot provide direct evidence on the availability of the standard setting procedures at its website, additional indirect evidences and information provide sufficient level of confidence that the document was made available at the NCCF's website.</p>
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#### PEFC ST 1001:2010, 5.4

5.4 The standardising body shall review the standard-setting process based on comments received from the public announcement and establish a working group/committee or adjust the composition of an already existing working group/committee based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the working group/committee and resources available for the standard-setting.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.4 states that: "The NCCF shall review the standard-setting process based on comments received from the public announcement and establish a standard development group or adjust the composition of an already existing standard development group, based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the standard development group and resources available for the standard-setting".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p><b>Review of the standard setting process</b></p> <p>The NCCF started communication with key stakeholders already in 2014. The minutes of the NCCF's Governing Board from January 2015 make reference to mail communication with stakeholders of 27 July 2014<sup>[43]</sup>. The minutes also refer to comments received from stakeholders and their consideration.</p> <p>The formal announcement was made as a part of the international conference held on 16 March 2015. A part of the conference was also 15 minutes presentation on the NCCF launch made by Mr. Suneel Pandey, Secretary, NCCF &amp; VP, ITC Ltd.<sup>[7]</sup>. The panel discussion during the conference was focused on (i) contribution of forest certification to forest practices in India and (ii) demand for certified products<sup>[7]</sup>. The stakeholders' interviews carried out during the in-country visit confirmed that the seminar also included discussion session.</p>

	<p>The SDG meeting organised after the international seminar (17/3/2018) considered outputs of the seminar and stakeholders' comments<sup>[50]</sup>.</p> <p>Following the stakeholders' input, the standard setting process was reviewed during the process itself. This resulted not only in extension of its duration but also in adding additional activities such as the outreach programme organised in 2016.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> Although there is no direct evidence on comments received from stakeholders, there is evidence that the NCCF's bodies were considering comments from stakeholders relating to the standard setting process.</p> <p><b>Appointment of members of the Working Group</b></p> <p>The applicant provided e-mail correspondence<sup>[2]</sup> with stakeholders that were invited to participate in the SDG that provides sufficient evidence that no nomination made by those stakeholders was rejected.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The appointment of the SDG members satisfies the PEFC requirement.</p>
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#### PEFC ST 1001:2010, 5.5

5.5 The work of the working group/committee shall be organised in an open and transparent manner where: a) working drafts shall be available to all members of the working group/committee,

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.5 states that "The work of the standard development group shall be organized in an open and transparent manner where: (a) Working drafts shall be made available to all members of the Standard development group".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The assessment evaluated randomly selected number of SDG meetings (7/5/2016, 20/8/2016) and TWG meetings (20/8/2016, 23/9/2016, 16/12/2016). In principle, the SDG / TWG members were invited in advance, were provided with an agenda for the meetings<sup>[11, 12, 13, 14, 15, 16]</sup>.</p> <p>The SDG / TWG run its own internal "consultations" on individual parts of the standard and for this purpose the draft parts of the standard were accessible to the SDG members though the NCCF's website:</p> <ul style="list-style-type: none"> <li>- 16 September 2015 – 19 September 2015 for part A<sup>[38]</sup>;</li> <li>- 15 December 2015 – 15 January 2016 for parts B and C<sup>[39]</sup>;</li> <li>- 22 December 2015 – 16 January 2016 for parts D, E and F<sup>[40]</sup>.</li> </ul> <p>The complete version of the standard was distributed to the SDG members on 26 September 2016<sup>[41]</sup>.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The evaluated communication for a sample of SDG TWG meetings between NCCF and the SDG/TWG members confirms that members of the SDG/TWG have been duly invited in written and that the invitation always included agenda to the respective meetings.</p> <p>The latest versions of the standard were not always circulated together with the invitation to the meeting.</p>

	However, the SDG run its own internal consultation and individual parts (drafts) of the standard were always accessible through the NCCF website.
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5.5 The work of the working group/committee shall be organised in an open and transparent manner where: b) all members of the working group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.5 states that “The work of the standard development group shall be organized in an open and transparent manner where: (b) All members of the standard development group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The assessment evaluated randomly selected number of SDG meetings (7/5/2016, 20/8/2016) and TWG meetings (20/8/2016, 23/9/2016, 16/12/2016).</p> <p>For all the selected meetings, the minutes of the meetings<sup>[17-21]</sup> provide detailed records of the debate and main topics and arguments of the SDG/TWG members. The minutes of the meetings provide sufficient confidence that members contributed to the work of the respective meetings without any restrictions.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The NCCF followed very high standard in keeping minutes of the SDG / TWG meetings. Those minutes provide not only topics discussed but also records contribution of individual members of the committees.</p> <p>The minutes of the meetings provide sufficient confidence that members contributed to the work of the respective meetings without any restrictions.</p>

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

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.5 states that “The work of the standard development group shall be organized in an open and transparent manner where: (c) Comments and views submitted by any member of the standard development group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The assessment evaluated randomly selected number of SDG meetings (7/5/2016, 20/8/2016) and TWG meetings (20/8/2016, 23/9/2016, and 16/12/2016).</p> <p>For all the selected meetings, the minutes of the meetings<sup>[17-21]</sup> provide detailed records of the debate and main topics and arguments of the SDG/TWG members. The minutes of the meetings provide sufficient confidence that members contributed to the work of the respective meetings without any restrictions.</p> <p>The minutes of the meetings, presentations made at the meetings as well as changed parts of the draft standard were provided to the SDG/TWG members shortly after the meeting<sup>[14, 22-24]</sup>.</p>



	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The NCCF followed very high standard in keeping minutes of the SDG / TWG meetings as well as in timely communication with the SDG/TWG members. Contribution of SDG/TWG members at the meetings was well recorded and members of the SDG/TWG always received after the meeting an e-mail with the minutes, presentations and other relevant documents.</p> <p>The minutes of the meetings together with e-mail communication between the NCCF and SDG/TWG members provide sufficient confidence that the work and management of those committees was open and transparent.</p>
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PEFC ST 1001:2010, 5.6	
5.6a [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the start and the end of the public consultation is announced in a timely manner in suitable media	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (a) The start and the end of the public consultation is announced in a timely manner in suitable media".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The NCCF carried out a formal public and stakeholders' consultation during the period from 3 October 2016 until 2 December 2016:</p> <ul style="list-style-type: none"> <li>- The consultation was announced at the NCCF's official website<sup>[25]</sup>;</li> <li>- The NCCF circulated the announcement by e-mail<sup>[26]</sup>; the e-mail distribution was checked during the in-country visit.</li> <li>- The NCCF published the announcement of the public consultation on 7 October 2016<sup>[51]</sup>, currently the NCCF's Facebook has about 1200 friends.</li> <li>- The NCCF carried out three workshops: on 25/10/2016 in Bangalore, on 8/11/2016 in Odisha and on 8/12/2016 in Guwahati<sup>[27]</sup>, the NCCF invited a large number of stakeholders of various stakeholder categories: 176 stakeholders to the Bangalore, 132 to the Odisha and 91 to the Guwahati workshops<sup>[42]</sup>.</li> </ul> <p>In addition to the formal stakeholders' consultation, the NCCF carried out an extensive outreach project<sup>[5, 6]</sup> (April – June 2016) that was focused on engaging main (key and disadvantaged) stakeholders operating at the regional level. The outreach project included detailed and comprehensive stakeholders mapping, definition of main stakeholder groups, selection of stakeholders for consultation and interviews, identification of critical topics and identification of prospectus stakeholders.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The NCCF announced the start of the public consultation in several media identified above. In addition, it carried out three workshops supporting the stakeholders' consultation.</p>

5.6b [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The applicant provided a sample of invitation that was distributed by e-mail<sup>[26]</sup> to a large number of stakeholders identified in the stakeholder mapping<sup>[42]</sup>, the e-mail communication was checked during the in-country visit.</p> <p>The NCCF published the announcement of the public consultation on 7 October 2016<sup>[51]</sup>, currently the NCCF's Facebook has about 1200 friends.</p> <p>The NCCF carried out three workshops: on 25/10/2016 in Bangalore, on 8/11/2016 in Odisha and on 8/12/2016 in Guwahati<sup>[27]</sup>, the NCCF invited a large number of stakeholders of various stakeholder categories: 176 stakeholders to the Bangalore, 132 to the Odisha and 91 to the Guwahati workshops<sup>[42]</sup>.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> Both the e-mail and Facebook distribution of the public consultation announcement as well as workshops satisfy the objective of the PEFC requirement.</p>

5.6c [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the enquiry draft is publicly available and accessible	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (c) the enquiry draft is publicly available and accessible".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The stakeholders' consultation announced at the NCCF's official website<sup>[25]</sup> also provided access to the commented draft standard and other relevant documentation.</p> <p>The draft standard was also attached within the e-mail distribution<sup>[26]</sup> and was included in the e-mail invitation to the three workshops: on 25/10/2016 in Bangalore, on 8/11/2016 in Odisha and on 8/12/2016 in Guwahati<sup>[27]</sup>.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The draft standard was available at the applicant's website and was attached to the e-mail distribution and invitations.</p>

5.6d [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] the public consultation is for at least 60 days	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (d) the public consultation is for at least 60 days".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The stakeholders' consultation announced at the NCCF's official website<sup>[25]</sup> also includes dates of the consultation start (3<sup>rd</sup> October 2016) and end (2 December 2016).</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The consultation lasted 60 days.</p>
5.6e [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] all comments received are considered by the working group/committee in an objective manner	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (e) all comments received are considered by the working group/committee in an objective manner".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The applicant provided a document with comments received from stakeholders during the development of the standard<sup>[28]</sup>. This table includes comments from the SDG/TWG members before the public consultation, comments received during the public consultation as well as comments relating to final editing after the public consultation. The document also includes results of the comments' consideration by the SDG/ TWG.</p> <p>The document was prepared based on the request of the TWG as the minutes of the TWG meeting held on 16 December 2016<sup>[21]</sup> includes information that the TWG should compile all the comments received during the on-line consultation as well as at the workshops.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The NCCF records all received comments as well as results of their consideration.</p>
5.6f [The standardising body shall organise a public consultation on the enquiry draft and shall ensure that] a synopsis of received comments compiled from material issues, including the results of their consideration, is publicly available, for example on a website.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard 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".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>

Process	<p>The applicant provided a document with comments received from stakeholders during the development of the standard<sup>[28]</sup>. This table is also available at the NCCF's official website: <a href="http://www.nccf.in/forest-management-certification-standard.html">http://www.nccf.in/forest-management-certification-standard.html</a></p> <p>This table includes comments from the SDG/TWG members before the public consultation, comments received during the public consultation as well as comments relating to final editing after the public consultation. The document also includes results of the comments' consideration by the SDG/ TWG.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The NCCF made publicly available all comments received during the standard setting process, including the public consultation comments, as well as results of their consideration.</p>
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### PEFC ST 1001:2010, 5.7

5.7 The standardising body shall organise pilot testing of the new standards and the results of the pilot testing shall be considered by the working group/committee.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.7 states that "The NCCF shall organize pilot testing of the new standards and the results of the pilot testing shall be considered by the Standard development group, or its constituted working group/ committee".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The NCCF carried out pilot testing<sup>[29]</sup> of the draft forest management standard (version after the public consultation, V1.1) at three forest management units:</p> <ul style="list-style-type: none"> <li>- Dandeli Forest Division, Karnataka (7/3 – 10/3/2017)</li> <li>- Nagaon Forest Division, Assam (20/3 – 25/3/2017)</li> <li>- Hoshangabad Forest Division, Madhya Pradesh (21/3 – 25/3/2017)</li> </ul> <p>The pilot testing was performed by personnel with experience in auditing of forest management that were selected by the NCCF based on open "Expression of Interest" <sup>[30]</sup>. As observers participated in the pilot testing representatives of IFCRE (Indian Council of Forestry Research and Education) and WWF<sup>[29]</sup>.</p> <p>The auditing results have been reported<sup>[31]</sup> and reviewed by the TWG at its meeting held on 3 June 2017<sup>[32]</sup>.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> Draft standard has been tested and results of the testing were considered by the TWG. The pilot testing carried out by the NCCF was carried in very comprehensive and professional manner.</p>

**PEFC ST 1001:2010, 5.8**

5.8 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus.

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

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.8 states that “The decision of the Standard Development Group to recommend the final draft for formal approval to the NCCF Governing Body shall be taken on the basis of a consensus. In case of any opposition the following processes can be used by the standard development group to reach an accord:</p> <ul style="list-style-type: none"> <li>(a) a face-to-face meeting where there is a verbal yes/no vote, or show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,</li> <li>(b) a telephone conference meeting where there is a verbal yes/no vote,</li> <li>(c) an email meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote),</li> <li>(d) or combinations thereof”.</li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The SDG voted on the final draft of the forest management standard using a postal ballot. An invitation to the postal ballot was sent out by e-mail on 30 August 2017<sup>[33]</sup>. 15 members of the SDG provided e-mail consent<sup>[33]</sup> on the final draft to be formally approved by the NCCF's Governing Body, 3 members provided in consent in person, 2 members by telephone and 2 members did not vote as they left their organisation (WWF) <sup>[34]</sup>.</p> <p>There is no evidence that any member of the SDG voted against or objected the formal approval of the standard.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDG reached consensus on the final draft of the Standard.</p> <p><b>Observation:</b> The NCCF keeps the records of the vote in a form of e-mail correspondence<sup>[33]</sup> and an Excel sheet with the results of the voting<sup>[34]</sup>. It should be noted that votes made “in-person” or on the phone are difficult to verify and the Excel sheet should be supported by formal minutes prepared and signed by the SDG Chairman.</p>

**PEFC ST 1001:2010, 5.9**

5.9 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):

- a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,
- b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,
- c) dispute resolution process.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.9 states that:</p> <p>“In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <ul style="list-style-type: none"> <li>(a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,</li> <li>(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,</li> <li>(c) dispute resolution process”.</li> </ul> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p><b>Conclusion: Conformity</b></p> <p>The SDG was using a vote by e-mail with no negative vote, opposition or comments.</p>

**PEFC ST 1001:2010, 5.10**

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

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.10 states that: “Documentation on the implementation of the standard-setting process shall be made publicly available”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The standard setting process is described in the Development Report that is a part of the PEFC endorsement application and was made publicly available at the NCCF's official website: <a href="http://nccf.in/wp-content/uploads/2018/08/4.Development-report.pdf">http://nccf.in/wp-content/uploads/2018/08/4.Development-report.pdf</a></p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> Publication of the Development Report satisfies the PEFC requirement.</p>

PEFC ST 1001:2010, 5.11	
5.11 The standardising body shall formally approve the standards/normative documents based on evidence of consensus reached by the working group/committee.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.1 states that: “The NCCF Governing Body shall formally approve the standards based on evidence of consensus reached by the standard development group. All standards shall be approved by the Governing Body of NCCF”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The forest management standard was approved by members of the Governing Body of the NCCF on 9 September 2017<sup>[35]</sup>.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The SFM standard was formally approved by the NCCF’s Governing Body.</p>

PEFC ST 1001:2010, 5.12	
5.12 The formally approved standards/normative documents shall be published in a timely manner and made publicly available.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.2 states that: “The formally approved standards documents shall be published in a timely manner and made publicly available on website of NCCF within 30 days of approval or as otherwise advised by the Governing Body in case of any changes suggested in the standard”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	<p>The NCCF decided to officially launch the forest management standard (and the scheme) at the national conference held on 13 January 2018<sup>[36]</sup>. The conference was well attended by stakeholders, including senior officials of the government.</p> <p>The event was well covered by national news media (5) as well as internet media (42)<sup>[37]</sup>.</p> <p>The NCCF’s website (<a href="http://www.nccf.in">http://www.nccf.in</a>) provides access to the formally approved forest management standard.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The NCCF Council presented the formally approved standard to the public through the national conference and the event was well covered by media.</p> <p>The standard is published at the NCCF’s website.</p>

PEFC ST 1001:2010, 6.1	
6.1 The standards/normative documents shall be reviewed and revised at intervals that do not exceed a five-year period. The procedures for the revision of the standards/normative documents shall follow those set out in chapter 5.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.2 states that “The standards documents shall be reviewed and revised at intervals that do not exceed a five-year period and as and when required. The procedures for the revision of the management standards shall follow procedures set out in Section 5”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
Process	Not applicable. The assessment concerns the first edition of the standard.

PEFC ST 1001:2010, 6.2	
6.2 The revision shall define the application date and transition date of the revised standards/normative documents.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.4 states that “The revision shall define the application date and transition date of the revised standards documents”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The procedures require to define both, the application as well as the transition date.</p>
Process	Not applicable. The assessment concerns the first edition of the standard.



PEFC ST 1001:2010, 6.3	
6.3 The application date shall not exceed a period of one year from the publication of the standard. This is needed for the endorsement of the revised standards/normative documents, introducing the changes, information dissemination and training.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.5 states that “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 documents, introducing the changes, information dissemination and training”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The procedures define for the application date a maximum of one year from the standard’s publication.</p>
Process	Not applicable. The assessment concerns the first edition of the standard.

PEFC ST 1001:2010, 6.4	
6.4 The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards/normative documents requires a longer period.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.6 states that “The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards documents requires a longer period”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the PEFC requirement.</p>
Process	Not applicable. The assessment concerns the first edition of the standard.

## Annex B: Detailed assessment of the group certification model

PEFC ST 1002, 4.1	
4.1 Does the forest certification scheme provide clear definitions for the following terms in conformity with the definitions of those terms presented in chapter 3 of PEFC ST 1002:2010:	
a) the group organisation,	<p>NCCF STD GM 1/2017, chapter 3.5:</p> <p><b>“Group Organization:</b> A group of <b>participants</b> represented by the <b>group entity</b> for the purposes of implementation of the sustainable forest management standard and its certification.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The definition is identical to PEFC ST 1002.</p>
b) the group entity,	<p>NCCF STD GM 1/2017, chapter 3.2:</p> <p><b>“Group entity:</b> A Group entity/individual represents the <b>participants</b>, with overall responsibility for ensuring the conformity of forest management in the <b>certified area</b> to the sustainable forest management standard and other applicable requirements of the forest certification scheme.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The definition complies with PEFC ST 1002.</p>
c) the participant,	<p>NCCF STD GM 1/2017, chapter 3.6:</p> <p><b>“The participant:</b> These are a forest and/or land owner/manager covered by the <b>group forest certificate</b>, who has the legal right to manage the forest in a clearly defined area, and the ability to implement the requirements of the sustainable forest management standard in that area and laid by group entity.</p> <p>Note1: The term “ability to implement the requirements of the management standard” requires the entity to have a long-term legal right to manage the forest and would disqualify one-off contractors from becoming participants in group certification”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The definition is consistent with PEFC ST 1002.</p>
d) the certified area,	<p>NCCF STD GM 1/2017, chapter 3.1:</p> <p><b>“Certified area:</b> A total area of the certified forests. In the case of a <b>group forest certificate</b> it is the sum of forest areas of the <b>participants</b>”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The definition is identical to PEFC ST 1002.</p>

e) the group forest certificate	<p>NCCF STD GM 1/2017, chapter 3.3:</p> <p><b>“Group forest certificate:</b> A document confirming that the <b>group organisation</b> complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certification scheme”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The definition is identical to PEFC ST 1002.</p>
f) the document confirming participation in group forest certification.	<p>NCCF STD GM 1/2017, chapter 3.7:</p> <p><b>“Document confirming participation in group forest certification:</b> A document issued to an individual <b>participant</b> that refers to the <b>group forest certificate</b> and that confirms the <b>participant/member</b> as being covered by the scope of the <b>group forest certification</b>.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The definition is consistent with PEFC ST 1002.</p>

PEFC ST 1002, 4.1.2	NCCF STD GM 1/2017
4.1.2 In cases where a forest certification scheme allows an individual forest owner to be covered by additional group or individual forest management certifications, the scheme shall ensure that non-conformity by the forest owner identified under one forest management certification is addressed in any other forest management certification that covers the forest owner.	<p>3.6 Definition of “participant / Group member”</p> <p>“Eligibility - NCCF group certification standard does not allow a group member to be part of more than one group entity certification or individual forest management certification”</p> <p>Part A, 2.10: [The consent declaration shall]:</p> <p>“e. declare their participation in only one group or individual forest management certification”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The PEFC requirement is not applicable as the scheme does not allow a participant to participate in more groups or in another individual forest management certification.</p>	

PEFC ST 1002, 4.1.3	NCCF STD GM 1/2017
4.1.3 The forest certification scheme shall define requirements for group forest certification which ensure that participants’ conformity with the sustainable forest management standard is centrally administered and is subject to central review and that all participants shall be subject to the internal monitoring programme.	<p>“1.4 The entity shall operate an annual internal monitoring programme that provides for the evaluation of the participants’ conformity with the certification requirements”.</p> <p>“1.6 The Group entity shall operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body’s evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken”.</p> <p>“1.7 To provide a public policy of commitment on behalf of the whole group organisation to comply with the applicable requirements of the NCCF</p>

	<p>standards”.</p> <p>“2.2 The entity shall establish clear objectives and written procedures for the management of the group organisation clearly defining the division of responsibilities between the Group entity and the members in relation to the Management activities like adhering to the management planning, monitoring, harvesting, quality control etc, for the implementation of the NCCF Standard”.</p> <p>“2.5 The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the applicable standard”.</p> <p>“7.1 The Group entity shall implement a documented monitoring and control system including the regular (at least annual) monitoring visits to the certified area to check and confirm continued compliance with all the requirements of Standard and group membership’s requirements”.</p> <p>“7.6e the group entity shall evaluate the information about conformity of the participants to the applicable standard that is obtained from publicly available sources and other interested parties”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 includes requirements relating to commitment made by the group entity on behalf of the whole group (1.7); definition of objectives and procedures for the whole group (2.2); requires division of responsibilities between the group entity and participants (2.2) and contractual relationship between those bodies (2.5); requires an internal monitoring programme (7.1) and review of the participants conformity (1.6, 7.6e). The elements above ensure that the participants conformity is centrally managed and controlled by the group entity.</p>	

PEFC ST 1002, 4.1.4	NCCF STD GM 1/2017
<p>4.1.4 The forest certification scheme shall define requirements for an annual internal monitoring programme that provides sufficient confidence in the conformity of the whole group organisation with the sustainable forest management standard.</p>	<p>“7.1 The Group entity shall implement a documented monitoring and control system including the regular (at least annual) monitoring visits to the certified area to check and confirm continued compliance with all the requirements of Standard and group membership’s requirements”.</p> <p>Additional requirements 7.2 – 7.6. provide procedures for implementation of the internal monitoring and control programme.</p> <p>Chapter 8 defines sampling methodology for the internal monitoring and control programme that requires to identify “structural category”, e.g. state management organisation vs private owners, for which the sample of audited units is defined based on a sampling formula of table 1.</p>

**Conclusion: Conformity**

**Justification:** NCCF STD GM 1/2017 includes requirements for an annual internal monitoring system that is based on sampling methodology. The sampling formula provides sufficient confidence in the performance of the whole group.

PEFC ST 1002, 4.2.1	NCCF STD GM 1/2017
4.2.1 The forest certification scheme shall define the following requirements for the function and responsibility of the group entity:	
a) To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;	<p>Chapter 2.1: [Responsibilities and functions of group entity]:</p> <p>“To represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>
b) To provide a commitment on behalf of the whole group organisation to comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	<p>Chapter 1.7: [Responsibilities and functions of group entity]:</p> <p>“To provide a public policy of commitment on behalf of the whole group organisation to comply with the applicable requirements of the NCCF standards”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>
c) To establish written procedures for the management of the group organisation;	<p>Chapter 2.2: [Responsibilities and functions of group entity]:</p> <p>“The entity shall establish clear objectives and written procedures for the management of the group organisation clearly defining the division of responsibilities between the Group entity and the members in relation to the Management activities like adhering to the management planning, monitoring, harvesting, quality control etc, for the implementation of the NCCF Standard”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>

<p>d) To keep records of:</p> <ul style="list-style-type: none"> <li>- the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification scheme,</li> <li>- all participants, including their contact details, identification of their forest property and its/their size(s),</li> <li>- the certified area,</li> <li>- the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;</li> </ul>	<p>Chapter 3.1: [Responsibilities and functions of group entity]:</p> <p>"The group entity shall maintain up-to-date records the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the NFCS, including but not limited to:</p> <ol style="list-style-type: none"> <li>I. List of names and contact details of Participants, together with dates of entering and leaving the Group scheme, reason for leaving, and identification of their forest property and its/their size(s),</li> <li>II. Any records of training provided to staff or Participants, relevant to the implementation of this standard and applicable NCCF standard;</li> <li>III. The certified area, map or supporting documentation describing or showing the location of the member's forest properties;</li> <li>IV. Evidence of consent of all Participants;</li> <li>V. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems); taken to correct any such non-compliance;</li> <li>VI. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken.</li> <li>VII. Records of the estimated annual overall NCCF production and sales of the Group".</li> </ol> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement. It requires keeping records relating to the participants conformity (general, v), participants identification and certified area (i, iii, vii), and the internal monitoring programme (vi)</p>
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<p>e) To establish connections with all participants based on a written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the sustainable forest management standard;</p>	<p>Chapter 2.5: [Responsibilities and functions of group entity]:</p> <p>"The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of non-conformity with the applicable standard".</p> <p>Chapter 2.10: [Responsibilities and functions of group entity]:</p> <p>"A consent declaration or equivalent shall be available between the Group Entity and each Participant or the member's representative who voluntarily wishes to participate in the Group. The consent declaration shall:</p> <ul style="list-style-type: none"> <li>a. include a commitment to comply with all applicable certification standard requirements;</li> <li>b. acknowledge and agree to the obligations and responsibilities of the Group entity;</li> <li>c. acknowledge and agree to the obligations and responsibilities of membership;</li> <li>d. agree to membership of the scheme, <i>and</i> authorise the Group entity to be the primary contact for certification and to apply for certification on the member's behalf".</li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement. It requires contractual relationship between the group entity and participants (2.5) as well as defines the consent to be a part of the contract (2.10).</p>
<p>f) To provide participants with a document confirming participation in the group forest certification;</p>	<p>Chapter 2.7: [Responsibilities and functions of group entity]:</p> <p>"The Group Entity shall provide participants with a document confirming participation in the group forest certification".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>
<p>g) To provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the forest certification scheme;</p>	<p>Chapter 1.5: "The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable NCCF standards".</p> <p>Chapter 2.7: [Responsibilities and functions of group entity]:</p> <p>"The Group Entity shall provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the NCCF standard".</p>

	<p>Chapter 2.9: [Responsibilities and functions of group entity]:</p> <p>“The Group Entity shall provide all participants with information and guidance required for the effective implementation of the sustainable forest management standard and other applicable requirements of the NCCF standard”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement, it provides training, guidance as well as access to information.</p>
h) To operate an annual internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements, and;	<p>“7.1 The Group entity shall implement a documented monitoring and control system including the regular (at least annual) monitoring visits to the certified area to check and confirm continued compliance with all the requirements of Standard and group membership's requirements”.</p> <p>Additional requirements 7.2 – 7.6 provide procedures for implementation of the internal monitoring and control programme.</p> <p>Chapter 8 defines sampling methodology for the internal monitoring and control programme that requires to identify “structural category”, e.g. state management organisation vs private owners, for which the sample of audited units is defined based on a sampling formula of table 1.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>
i) To operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken.	<p>Chapter 1.6:</p> <p>“The Group entity shall operate a review of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme and the certification body's evaluations and surveillance; corrective and preventive measures if required; and the evaluation of the effectiveness of corrective actions taken”.</p> <p>Chapter 7.1</p> <p>“The Group entity shall implement a documented monitoring and control system including the regular (at least annual) monitoring visits to the certified area to check and confirm continued compliance with all the requirements of Standard and group membership's requirements”.</p> <p>Chapter 7.3</p> <p>“The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation”.</p> <p>Chapter 7.6</p>



	<p>“The group entity is responsible to develop and operate an annual internal monitoring programme to provide sufficient confidence in the conformity of the group organisation with the applicable standard. The elements of the internal monitoring programme shall include the following: ... (e) the group entity shall evaluate the information about conformity of the participants to the applicable standard that is obtained from publicly available sources and other interested parties”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement; it requires to carry out review of the results of the internal monitoring programme and implement corrective and preventive measures.</p>
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PEFC ST 1002	NCCF STD GM 1/2017
4.3.1 The forest certification scheme shall define the following requirements for the participants:	
a) To provide the group entity with a written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	<p>Chapter 6.1:</p> <p>“The function and responsibilities of the participants are as follows: (a) To provide the group entity with a written agreement, including a commitment on conformity with the applicable standard and other applicable requirements of the NFCS”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>
b) To comply with the sustainable forest management standard and other applicable requirements of the forest certification scheme;	<p>Chapter 6.1:</p> <p>“The function and responsibilities of the participants are as follows: (b) To comply with the applicable standard requirements and other applicable requirements of the NFCS”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>
c) To provide full co-operation and assistance in responding effectively to all requests from the group entity or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise;	<p>Chapter 6.1:</p> <p>“The function and responsibilities of the participants are as follows: (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 area and other facilities, regarding formal audits or reviews or otherwise”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>

d) To implement relevant corrective and preventive actions established by the group entity.	<p>Chapter 6.1:</p> <p>“The function and responsibilities of the participants are as follows: (d) To implement relevant corrective and preventive actions established by the group entity”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD GM 1/2017 satisfies the requirement.</p>
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## Annex C: Detailed assessment of sustainable forest management standard

PEFC ST 1003, 4.1a	NCCF STD FM 1/2017
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level.</p>	<p>The Standard includes both management system requirements (planning, monitoring, procedures, etc.) as well as specific performance requirements.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The document complies with the requirement.</p>	

PEFC ST 1003, 4.1b	NCCF STD FM 1/2017
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>b) be clear, objective-based and auditable.</p>	<p>The Standard includes clear, objective and auditable requirements that are supported by additional Verifiers and additional Guidance.</p> <p>Where a specific requirement is not sufficiently clear or objective, the fact is reported as a part of the specific requirement with the corresponding non-conformity or observation.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The document satisfies the requirement.</p>	

PEFC ST 1003, 4.1c	NCCF STD FM 1/2017
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>c) apply to activities of all operators in the defined forest area who have a measurable impact on achieving compliance with the requirements.</p>	<p>Indicator 3.2.5: "If the FME is engaging sub-contractors or outsourcing any portion of the work to outside agencies, the FME shall ensure that all such outsourcing agencies and subcontractors comply with the requirements of the management plan specific to their area of operations".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The Standard requires compliance of the sub-contracted parties with the provisions of the forest management plan. The requirements for the FMPs in the Standard are very detailed and include relevant parts of the Standard relating to operations, i.e. the parts that are also relevant to sub-contractors when employed. In addition, the Standard includes a wording for its requirements starting with "FME shall ensure...". This implies that it shall ensure compliance regardless of whether the work was performed by the FMU itself or by a contracted party.</p>	

PEFC ST 1003, 4.1d	NCCF STD FM 1/2017
<p>4.1 The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall</p> <p>d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards.</p>	<p>Indicator 1.1.3: "Records of all violations of these laws and the remedial, punitive or mediatory actions undertaken to address them are maintained by the FME."</p> <p>Indicator 1.2.3: "The FME shall maintain up-to-date records of all payments and makes them available to the assessment team".</p> <p>Indicator 2.3.2: "The FME shall record all such conflicts (tenure land claims) and their mode of resolution (along with outcomes), to avoid further litigation, as well as to set precedents for similar conflicts in future".</p> <p>Indicator 3.2.4: "The FME shall maintain records of training provided to its staff in management plan implementation commensurate with their roles and responsibilities".</p> <p>Indicator 4.1.2: "Written records shall be maintained of the periodic harvest levels of each commercial forest product, at levels of specificity appropriate to the scale and intensity of operations".</p> <p>Indicator 4.3.2: "The FME shall demonstrate a track record of implementing monitoring protocols which are consistent and replicable over time".</p> <p>Criterion 7.4: "Written guidelines regarding extraction of NWFPs (Non-Wood Forests Produce) are developed and records for the same maintained and monitored by the FME".</p> <p>Indicator 9.1.4: "Any complaints or grievances related to infringement of rights of forest dwellers, tribals and local communities shall be recorded and addressed by the FME on a priority basis".</p> <p>Indicator 9.4.3: "A stakeholder engagement process, based on Free, Prior Informed Consent shall be undertaken by the FME as part of the impact assessment process. The consultation process shall record and update the list of stakeholders, the consultation process and also documents the comments and concerns of the stakeholders".</p> <p>Indicator 9.5.3: "The FME shall record all instances of damage to resources and rights, including any grievances/complaints in this regard, as well as the list of affected parties".</p> <p>Indicator 10.1.4: "The FME shall maintain up-to-date accident/workplace injury/safety records; These records are updated to reflect type and</p>

	<p>nature of accident, cause and palliative action undertaken”.</p> <p>Indicator 10.4.2: “All the FME employees shall be trained in the proper implementation of the management plan. The FME maintains all records of these trainings”.</p> <p>Criterion 11.1: “The FME undertakes forest management operations in a manner that maintains the natural features of forest ecosystems, conserves biodiversity, protects water resources, prevents land degradation and restores degraded areas. Representative samples of existing ecosystems within the landscape are protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources”.</p> <p>Indicator 1.3.3.8: “...maintains records of all pesticides used, including the name of the product and active ingredient(s), location and method of application, total quantity applied, and the dates of application”</p> <p>Indicator 11.5.6: “For all exotics used in plantations, the management plan, or any other suitable document, shall record the seed source and provenance or the clone details”.</p> <p>Indicator 11.7.2: “The FME shall have records of all approvals for forest conversion granted as per the provisions of the Forest (Conservation) Act, 1980. Any area within the scope of the certificate, which has been converted without clear and unambiguous approval under the FCA, 1980, shall render the certificate liable for termination”.</p>
<p><b>Conclusion: conformity</b></p> <p><b>Justification:</b> The Standard includes a number of requirements relating to keeping records: legal compliance (1.1.3, 1.2.3); land tenure conflicts (2.3.2); training (3.2.6, 10.4.2); harvest level (4.1.2); monitoring (4.3.2); NWFPs (7.4); complaints (9.1.4, 9.5.3); stakeholders engagements (9.4.3); OHS (10.1.4); ecologically important ecosystems (1.1); pesticides (11.3.3.8); exotic species (11.5.6); forest conversion (11.7.2). In addition, many requirements result in records without specific references, e.g. forest management planning.</p> <p>Although the standard does not include a record keeping requirement that would cover all elements of SFM, the standard specifies records keeping for its critical elements.</p>	

PEFC ST 1003, 5.1.1	NCCF STD FM 1/2017
<p>5.1.1 Forest management planning shall aim to maintain or increase forests and other wooded areas and enhance the quality of the economic, ecological, cultural and social values of forest resources, including soil and water. This shall be done by making full use of related services and tools that support land-use planning and nature conservation.</p>	<p><b>Theme A:</b> This theme deals with the legality of the forest management enterprise and the legal status of all actions and activities attributed to it.</p> <p><b>Theme B:</b> This theme deals with the development and periodic updation of a written forest management plan, its implementation and monitoring.</p> <p><b>Theme C:</b> This theme deals with forest management activities and their social, economic and environmental impacts, as well as links with climate change.</p> <p><b>Theme D:</b> This theme deals with the aspect of 'economic viability of forest management operations' and is concerned with the sustainable and productive utilization of forest resources, including both forest products as well as services.</p> <p><b>Theme E:</b> This theme is concerned with the aspect of 'socially responsible forest management' and deals with social and community relations as well as rights of forest workers as well as tribals, forest dwellers and forest based communities.</p> <p><b>Theme F:</b> This theme deals with the aspect of 'environmental and ecological sustainability' of forest management and deals with matters related to identification and management of High Conservation Values, tangible and intangible forest services, biodiversity, natural resource conservation and management etc."</p> <p>Criterion 5.3: "Various protective measures are undertaken in forest management operations to maintain the natural features of forest lands, protect water resources, and prevent land degradation due to forest management activities".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes a number of requirements relating to maintenance of forest resources (Theme C), and enhancement its economic (Theme D), cultural (Theme E) and environmental (Theme F)) values, including water resources and soil (Criterion 5.3, Theme C).</p>	

PEFC ST 1003, 5.1.2	NCCF STD FM 1/2017
5.1.2 Forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management operations. This shall form a basis for a cycle of continuous improvement to minimise or avoid negative impacts.	<p>Principle 3: Development and implementation of a Management Plan/Working Plan</p> <p>Principle 4: Monitoring, Assessment and Review of management plan and its implementation</p> <p>Criterion 5.2: "Management planning and operations incorporate the results of evaluation of social and environmental impacts. The planning of management operations involve detailed consultations with all stakeholders who are affected or could be potentially affected by management operations".</p> <p>Criterion 7.1: "The FME undertakes the inventory, survey and mapping of forest resources, including standing stock, growing stock and forest resource regeneration in a periodic manner within the defined forest area. All merchantable forest produce under the scope of certification and chain of custody is inventoried and subject to an economic evaluation".</p> <p>Indicator 7.1.1: "The FME shall undertake periodic surveys and inventory of all forest resources under its jurisdiction and as given in the scope of certification".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 does not explicitly require the continuous improvement cycle as required by the PEFC requirement. However, it includes very detailed requirements for the inventory of forest resources (7.1), preparation of forest management plan (Principle 3), monitoring activities (Principle 4) satisfy the objective of the requirement. Principle 5 and in particular 5.2 require assessment of social, environmental and economic impacts.</p>	

PEFC ST 1003, 5.1.3	NCCF STD FM 1/2017
5.1.3 Inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the topics described in this document.	<p>Criterion 7.1: "The FME undertakes the inventory, survey and mapping of forest resources, including standing stock, growing stock and forest resource regeneration in a periodic manner within the defined forest area. All merchantable forest produce under the scope of certification and chain of custody is inventoried and subject to an economic evaluation".</p> <p>Indicator 7.1.1: "The FME shall undertake periodic surveys and inventory of all forest resources under its jurisdiction and as given in the scope of certification".</p> <p>Criterion 3.1 "The management plan documents:</p> <p>a. Maps describing the forest resource base including protected areas, planned</p>

	management activities and land ownership”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD FM 1/2017 includes clear requirements for forest inventory (7.1) as well as mapping as a part of the forest management plans (Criterion 3.1).	

PEFC ST 1003, 5.1.4	NCCF STD FM 1/2017
5.1.4 Management plans or their equivalents, appropriate to the size and use of the forest area, shall be elaborated and periodically updated. They shall be based on legislation as well as existing land-use plans, and adequately cover the forest resources.	<p>Criterion 3.1: “The FME develops and maintains a written management plan (and other supporting documents), appropriate to the scale, intensity and complexity of operations, that addresses the following plan components enumerated in this criterion, as well as the provisions for protection against forest fires, pests and diseases, illegal settlement and harvesting, safeguarding archaeological sites and others...”</p> <p>Indicator 3.1.1: “The FME shall develop a written management plan having the components a) – p) of the Criterion 3.1 as defined above”.</p> <p>Indicator 3.1.5: “Management plan shall be reviewed and revised every 10 year or in shorter period”.</p> <p>Indicator 14.1.7: “The FME shall participate in and/or incorporate the results of state, central, or regional conservation planning and priority-setting efforts to conserve biological diversity and consider these efforts in forest management planning. Examples of credible priority-setting efforts include state wildlife action plans, state forest action plans, relevant habitat conservation plans or wildlife recovery plans (e.g. Project Tiger, Project Elephant etc.)”.</p>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD FM 1/2017 includes very detailed requirements for forest management planning (3.1); defines the content of the FMPs, periodic (10 years) revision of the FMPs; as well as it refers to the state or regional plans (for conservation purposes, 14.1.7).	

PEFC ST 1003, 5.1.5	NCCF STD FM 1/2017
5.1.5 Management plans or their equivalents shall include at least a description of the current condition of the forest management unit, long-term objectives; and the average annual allowable cut, including its justification and, where relevant, the annually allowable exploitation of non-timber forest products.	<p>Criterion 3.1: “The FME develops and maintains a written management plan (and other supporting documents), appropriate to the scale, intensity and complexity of operations, that addresses the following plan components enumerated in this criterion, as well as the provisions for protection against forest fires, pests and diseases, illegal settlement and harvesting, safeguarding archaeological sites and others. The</p>



	<p>management plan documents:</p> <ul style="list-style-type: none"> <li>a. The objectives of management, which are 'socially beneficial, environmentally responsible and economically viable'.</li> <li>b. Qualitative and quantitative description of the forest resources under management, biodiversity attributes environmental limitations, land use and ownership status, socio-economic conditions and a profile of adjacent lands.</li> <li>c. Maps describing the forest resource base including protected areas, planned management activities and land ownership.</li> <li>d. Human and capital resource allocation to develop a functional and effective management plan.</li> <li>e. Description of silvicultural and/or other management systems, based on the ecology of the forest in question and information gathered through resource inventories.</li> <li>f. Rationale for rates of annual harvest and species selection.</li> <li>g. Description and justification of harvesting techniques and equipment to be used.</li> <li>h. Provisions for monitoring of forest growth and dynamics.</li> <li>i. Environmental and social safeguards based on environmental and social assessments and management impact identification.</li> <li>j. Mitigation strategy/plan for identified social and environmental impacts.</li> <li>k. Plans for the identification, protection and regeneration of rare, threatened and endangered species, habitats and ecosystems.</li> <li>l. Approved site specific plans for nurseries and plantations (ANR/NR/AR) - including site selection, species selection, soil and nutrient analysis, appropriate silvicultural interventions, appropriate pest and nutrient management regimes and post planting care.</li> <li>m. Fire prevention, management and suppression plan, appropriate to the scale and intensity of the fire hazard</li> <li>n. Assess the problem of grazing and measures to avoid overgrazing to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity</li> <li>o. Process of monitoring of management review including deviations, if any</li> <li>p. Protection against illegal activities</li> <li>q. Measures for protection of high</li> </ul>
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	conservation values".  Indicator 3.1.1: "The FME shall develop a written management plan having the components a) – p) of the Criterion 3.1 as defined above".
<b>Conclusion: Conformity</b>  <b>Justification:</b> NCCF STD FM 1/2017 includes an explicit requirement (3.1) for the content of the forest management plan that meets and significantly exceeds the PEFC requirement.	

PEFC ST 1003, 5.1.6	NCCF STD FM 1/2017
5.1.6 A summary of the forest management plan or its equivalent appropriate to the scope and scale of forest management, which contains information about the forest management measures to be applied, is publicly available. The summary may exclude confidential business and personal information and other information made confidential by national legislation or for the protection of cultural sites or sensitive natural resource features.	<p>Criterion 3.4: "FME makes publicly available a summary of the primary elements of the management plan. The public summary needs to be updated at least once during the period of validity of the management plan and as and when major changes occur in the management or resource base".</p> <p>Indicator 3.4.1: "The FME shall make publicly available the primary elements of the management plan (where ever possible in the locally prevalent language), including the information of the scope and scale of forest management to relevant stakeholders".</p> <p>Indicator 3.4.2: "The FME shall update the summary of the management plan at least once during the period of validity of the management plan, and as and when major changes occur in the management or in the resource base".</p>
<b>Conclusion: Conformity</b>  <b>Justification:</b> NCCF STD FM 1/2017 requires the summary of forest management plan to be public, where possible in the local language and up-date the public summary in case of major changes.	

PEFC ST 1003, 5.1.7	NCCF STD FM 1/2017
5.1.7 Monitoring of forest resources and evaluation of their management shall be periodically performed, and results fed back into the planning process.	<p>Criterion 4.1: "Appropriate to the scale and intensity of operations, forest management activities include the research and data collection to monitor the following attributes:</p> <ul style="list-style-type: none"> <li>a. Growth rates and condition of the forest, including degradation, regeneration and restoration/rehabilitation.</li> <li>b. Composition and observed changes in the flora and fauna.</li> <li>c. Change matrix of forest resources w.r.t. previous plans and management systems</li> <li>d. Yield of all forest products harvested.</li> </ul>

	<p>e. Costs, productivity, and efficiency of forest management.</p> <p>f. Economic, environmental and social impacts of harvesting and other operations.</p> <p>g. Changes in carbon stock through emission sequestration”.</p> <p>Criterion 4.3: “The frequency and intensity of monitoring is determined by the scale and intensity of forest management operations, as well as the relative complexity and fragility of the affected environment. Monitoring procedures are consistent and replicable over time to allow comparison of results and assessment of change”.</p> <p>Indicator 4.3.1: “Based on the scale and intensity of forest management activities and the local conditions, the FME shall define the monitoring indicators, monitoring protocols and the frequency and intensity of monitoring”.</p> <p>Indicator 4.3.2: “The FME shall demonstrate a track record of implementing monitoring protocols which are consistent and replicable over time”.</p> <p>Indicator 4.3.3: “The FME management shall undertake performance review against monitoring indicators in achieving objectives of forest management. The reviews are undertaken at the FME level at least annually”.</p> <p>Indicator 4.3.4: “Results of forest monitoring shall be reflected in the adaptive development/revision of the forest management plans and operation plans”.</p> <p>Criterion 4.5: “The management is periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic conditions prevalent in the area. Any change in legal status of the land or change in rights is documented in the management plan”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes detailed and comprehensive requirements for monitoring of forest resources (Principle 4), including specification of topics to be monitored (4.1), intensity and frequency of the monitoring (4.3) and use of monitoring results in management planning and operation (4.5).</p>	

PEFC ST 1003, 5.1.8

NCCF STD FM 1/2017

<p>5.1.8 Responsibilities for sustainable forest management shall be clearly defined and assigned.</p>	<p>Indicator 7.2.8</p> <p>“Responsibilities for sustainable forest management are clearly defined and assigned”.</p> <p>Indicator 3.2.2: “The FME shall ensure that the forest staff and workers are aware of their respective roles in implementation of the management plan, and are provided with appropriate training and capacity building to undertake the same as per documented mechanisms”.</p> <p>Indicator 3.2.4: “The FME shall maintain records of training provided to its staff in management plan implementation commensurate with their roles and responsibilities”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 satisfies the requirement.</p>	

PEFC ST 1003, 5.1.9	NCCF STD FM 1/2017
<p>5.1.9 Forest management practices shall safeguard the quantity and quality of the forest resources in the medium and long term by balancing harvesting and growth rates, and by preferring techniques that minimise direct or indirect damage to forest, soil or water resources.</p>	<p>Criterion 7.2: “The FME has established the total quantum of removable material that can be harvested for all extractable forest produce, which is defined as per standard independent assessment methodologies and/or established conventional practices”.</p> <p>Indicator 7.2.1: “The FME shall determine the total quantum of forest produce that can be sustainably harvested from the defined forest area. The sustainable limits for each forest produce are accordingly provisioned in the management plan”.</p> <p>Indicator 7.2.2: “The FME shall define and document independent assessment methodologies and/or conventional practices that has been used to determine the sustainable harvest limits for the forest produce, based on a combination of empirical data and published literature”.</p> <p>Criterion 7.3: “The FME ensures that rates and extent of forest produce extraction is maintained at levels that are sustainable, and that annual removal of forest produce is well within the limits set for each individual forest resource (i.e., either wood or non-wood)”.</p> <p>Indicator 7.3.1: “The FME shall define the harvest rates for all merchantable forest produce in the management plan for the management cycle. The harvests are maintained at a sustainable level and the resource inventory shows an increasing trend, or, at the least, are maintained at present levels in future as well”.</p>

	<p>Indicator 7.3.2: “For natural forest management operations, the average annual harvests, either by area, volume or mass, shall not exceed the annual removable harvest limits established through Criterion 7.2, and the limits prescribed under the Management Plan”.</p> <p>Indicator 7.3.3: “For plantation management, the growth and harvest rates (for thinning and final harvests), shall be based on well-documented information and/or field trials, and consistent with the observed behaviour of the species at the national or regional level. In all cases, the upper limits specified under Criterion 7.2 shall be inviolable”.</p> <p>Indicator 5.3.1: “Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity”.</p> <p>Indicator 5.3.3: “Negative impacts on the quality and quantity of water resources are should be avoided, soil and water erosion controlled, and damage to catchments within the forest avoided”.</p> <p>Indicator 11.2.6: “The FME shall ensure that no damage to forests occur because of site disturbing activities like land preparation, tending, harvesting, road construction etc. and the natural features of the soil and its long-time productivity in the forest are maintained”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes requirements for identification and calculation of sustainable harvest level (7.2); sustainable harvest (7.3); requirements for soil protection (5.3.1), and requirements for water protection (11.2.6).</p>	

PEFC ST 1003, 5.1.10	NCCF STD FM 1/2017
<p>5.1.10 Appropriate silvicultural measures shall be taken to maintain or reach a level of the growing stock that is economically, ecologically and socially desirable.</p>	<p>Criterion 7.2: “The FME has established the total quantum of removable material that can be harvested for all extractable forest produce, which is defined as per standard independent assessment methodologies and/or established conventional practices”.</p> <p>Indicator 7.2.1: “The FME shall determine the total quantum of forest produce that can be sustainably harvested from the defined forest area. The sustainable limits for each forest produce are accordingly provisioned in the management plan”.</p> <p>Indicator 7.2.2: “The FME shall define and document independent assessment</p>

	<p>methodologies and/or conventional practices that has been used to determine the sustainable harvest limits for the forest produce, based on a combination of empirical data and published literature”.</p> <p>Criterion 7.3: “The FME ensures that rates and extent of forest produce extraction is maintained at levels that are sustainable, and that annual removal of forest produce is well within the limits set for each individual forest resource (i.e., either wood or non-wood)”.</p> <p>Indicator 7.3.1: “The FME shall define the harvest rates for all merchantable forest produce in the management plan for the management cycle. The harvests are maintained at a sustainable level and the resource inventory shows an increasing trend, or, at the least, are maintained at present levels in future as well”.</p> <p>Indicator 7.3.2: “For natural forest management operations, the average annual harvests, either by area, volume or mass, shall not exceed the annual removable harvest limits established through Criterion 7.2, and the limits prescribed under the Management Plan”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes detailed and comprehensive requirements for identification and calculation of sustainable harvest level (7.2) and sustainable harvest that does not exceeds the limits (7.3). The requirements ensure that the sustainable level of growing stock is maintained.</p>	

PEFC ST 1003, 5.1.11	NCCF STD FM 1/2017
<p>5.1.11 Conversion of forests to other types of land use, including conversion of primary forests to forest plantations, shall not occur unless in justified circumstances where the conversion:</p> <ul style="list-style-type: none"> <li>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</li> <li>b) entails a small proportion of forest type; and</li> <li>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</li> <li>d) makes a contribution to long-term conservation, economic, and social benefits.</li> </ul>	<p>Criterion 11.6: "The FME does not convert natural forests to plantations, nor natural forests or plantations to any other land use except when the conversion:</p> <ul style="list-style-type: none"> <li>a. occurs as per the specific provisions of the Forest (Conservation) Act, 1980, and</li> <li>b. affects a very limited portion of the area of the FMU, and</li> <li>c. Conversion shall not occur within high conservation value forest areas, threatened ecosystems, culturally and socially significant areas, or important habitats of threatened species.</li> </ul> <p>It must be understood that these criteria are to be read together, and any diversion of natural forests or plantations by the FME for any purpose under the Forest (Conservation) Act, 1980 shall not contravene Criteria 11.6 (b) and (c) above. However, notwithstanding sub-sections 11.6 a), b) and c) above, no conversion post December, 1994 shall be considered for certification".</p> <p>Indicator 11.6.1: "Forest areas that have been converted (either from plantation to non-forest use or from natural forest to plantation or to non-forest use) since December 1994 and/or are scheduled for conversion shall be identified".</p> <p>Indicator 11.6.2: "No conversion to plantations or non-forest lands shall occur, except in circumstances where the conversion:</p> <ul style="list-style-type: none"> <li>a. Occurs as per the specific provisions of the Forest (Conservation) Act, 1980.</li> <li>b. Affects no more than 0.5% of the total area of the FMU in the current or any future year and does not result in a cumulative total area converted more than 5% of the FMU since December 1994;</li> <li>c. Does not occur within or damage or threaten high conservation value forest areas, threatened ecosystems, culturally and socially significant areas, or important habitats of threatened species, and.</li> <li>d. Includes contribution to long-term conservation, economic, and social benefits in case of forest conversion".</li> </ul> <p>Criterion 11.7: "FMUs containing plantations that were established on areas converted from natural forest after December 1994 shall not qualify for certification, except where:</p>

	<p>a. clear and sufficient evidence is provided that the FME was not directly or indirectly responsible for the conversion, and</p> <p>b. the conversion affected a very limited portion of the area of the FMU, and</p> <p>c. clear, substantial, additional, secure long-term conservation benefits in the FMU are produced,</p> <p>d. does not occur within or damage or threaten high conservation value forest areas, threatened ecosystems, culturally and socially significant areas, or important habitats of threatened species”.</p> <p>Indicator11.7.1: “Areas of plantations, their original establishment dates, and the prior status of the areas shall be identified”.</p> <p>Indicator 11.7.2: “The FME shall have records of all approvals for forest conversion granted as per the provisions of the Forest (Conservation) Act, 1980. Any area within the scope of the certificate, which has been converted without clear and unambiguous approval under the FCA, 1980, shall render the certificate liable for termination”.</p> <p>Indicator11.7.3: “No areas have been converted from natural forest to plantation since December 1994 except where:</p> <p>a. The FME provides clear and sufficient evidence that it was not directly or indirectly responsible for the conversion; and</p> <p>b. The total area of plantation on sites converted from natural forest since December 1994 is less than 5% of the total area of the FMU, and</p> <p>c. The conversion will produce clear, substantial, additional, secure, long-term conservation benefits in the FMU”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes requirements for both (i) restriction of conversion of natural forests and plantations to non-forest use and natural forests to forest plantations and (ii) eligibility of plantations established by conversion of natural forests.</p> <p>The standard</p> <ul style="list-style-type: none"> <li>a) Makes mandatory reference to legislative requirements for forest conversion (Forest (Conservation) Act, 1980 (11.6) satisfying the PEFC requirement, bullet point a);</li> <li>b) Sets the scale of justifiable conversion to 0.5 % of the forest areas per year with cumulative limit of 5 % since 1994 (11.6) satisfying the PEFC requirement, bullet point b);</li> <li>c) Protects from any conversion the high conservation value forest areas, threatened ecosystems, culturally and socially significant areas, or important habitats of threatened species (11.6) satisfying the PEFC requirements, bullet point c);</li> </ul>	



- d) Requires contribution to long-term conservation, economic, and social benefits satisfying the PEFC requirements, bullet point c).

Concerning the eligibility of forest plantations to certification (Appendix 1 to PEFC ST 1003, interpretation to 5.1.11), the Standard only allows certification of those plantations established by conversion of natural forests (after 1994) where:

- a) the conversion was in compliance with the legislation and approved by the authorities (11.7.2);
- b) the conversion was limited in scale (no more than 5 % of the total forest area since 1994);
- c) clear, substantial, additional, secure long-term conservation benefits in the FMU are produced;
- d) the conversion does not occur within or damage or threaten high conservation value forest areas, threatened ecosystems, culturally and socially significant areas, or important habitats of threatened species.

PEFC ST 1003, 5.1.12	NCCF STD FM 1/2017
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.	The Checklist includes information that the requirement is not applicable to Indian conditions.
<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The issue of conversion of agriculture land into forests is not relevant to the forest management standard:</p> <ul style="list-style-type: none"> <li>a) management of agriculture and treeless areas is outside the scope of the standard, managers of the forest land are not responsible for management of agriculture land and tree less areas,</li> <li>b) afforestation of agriculture land and tree less areas will not result in forests as per the definition of the term “forests” made in the Glossary chapter of the standard. The term “forests” is strictly linked to areas that are statutorily recognised as forests by the legislation;</li> <li>c) The issue of conversion of the agriculture land will be covered by another standard of the NCCF scheme that will focus on “trees outside forests”.</li> </ul>	

PEFC ST 1003, 5.2.1	NCCF STD FM 1/2017
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.	<p>Criterion 3.1: “The FME develops and maintains a written management plan (and other supporting documents), appropriate to the scale, intensity and complexity of operations, that addresses the following plan components enumerated in this criterion, as well as the provisions for protection against forest fires, pests and diseases, illegal settlement and harvesting, safeguarding archaeological sites and others. The management plan documents:</p> <p>(h) Provisions for monitoring of forest growth and dynamics”.</p> <p>Indicator 5.4.5: “The FME should take appropriate steps to ensure that regeneration is successful and that young stands, in both</p>

	<p>harvested areas and restoration areas, either planted or naturally established, are well-stocked with desired species, vigorous and on the trajectory to healthy stands”.</p> <p>Criterion 11.1: “The FME undertakes forest management operations in a manner that maintains the natural features of forest ecosystems, conserves biodiversity, protects water resources, prevents land degradation and restores degraded areas”.</p> <p>Criterion 11.2: “The FME considers the impacts of its management activities on the forest areas’ biodiversity and ecological functions and undertakes rehabilitation/restoration of ecological functions/values that may have been damaged/degraded due to past management activities”.</p> <p>Indicator 11.2.7: “Where damage/degradation of the forest has occurred due to past management activities, the FME shall initiate steps to regenerate the forest and restore the ecological functions and values to a natural state which is typical to the locality”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes several requirements relating to maintenance and increase of forest health in forest management planning (3.1, 3.1h); monitoring of forest health (3.1h); appropriate regeneration contributing to the forest health (5.4.5); maintaining the natural features (11.1) and restoration of degraded forests (11.2, 11.2.7).</p>	

PEFC ST 1003, 5.2.2	NCCF STD FM 1/2017
<p>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.</p>	<p>Criterion 4.2: “The health and vitality of forests is 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.</p> <p>Indicator 4.2.1: The FME shall document the key biotic and abiotic factors that can potentially affect the health and vitality of forest ecosystems within the FMU.</p> <p>Indicator 4.2.2: The FME monitoring protocols shall include a periodic monitoring of key biotic and abiotic factors, based on the scale, intensity and risks of operations.</p> <p>Indicator 4.2.3: The FME should develop a change matrix for these indicators, so that appropriate preventive and remedial action may be undertaken, whenever there is a threat to forest ecosystem health and stability.</p> <p>Indicator 11.1.7: The FME shall periodically (based on the scale and intensity of forest</p>

	management operations and extent of forest resource, but at least once during the management plan cycle) monitor 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.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD FM 1/2017 includes comprehensive requirements for monitoring of health and vitality of forest resources, including key biotic and abiotic factors (4.1, 11.1.7). The periodicity and intensity of the monitoring shall be defined based on the extent of forest resources but carried out at least once during the management planning cycle (11.1.7).	

PEFC ST 1003, 5.2.3	NCCF STD FM 1/2017
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.	<p>Criterion 4.2: "The health and vitality of forests is 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".</p> <p>Indicator 4.2.1: "The FME shall document the key biotic and abiotic factors that can potentially affect the health and vitality of forest ecosystems within the FMU".</p> <p>Indicator 4.2.2: "The FME monitoring protocols shall include a periodic monitoring of key biotic and abiotic factors, based on the scale, intensity and risks of operations".</p> <p>Indicator 4.2.3: "The FME should develop a change matrix for these indicators, so that appropriate preventive and remedial action may be undertaken, whenever there is a threat to forest ecosystem health and stability".</p> <p>Indicator 11.1.7: "The FME shall periodically (based on the scale and intensity of forest management operations and extent of forest resource, but at least once during the management plan cycle) monitor 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".</p> <p>Indicator 5.4.4: "Harvesting should be designed and laid out, over time and space, with consideration of the types, sizes and frequency of natural disturbances as well as connectivity of wildlife habitats".</p>

**Conclusion: Conformity**

**Justification:** NCCF STD FM 1/2017 includes comprehensive requirements for monitoring of health and vitality of forest resources, including key biotic and abiotic factors (4.1, 11.1.7). The periodicity and intensity of the monitoring shall be defined based on the extent of forest resources but carried out at least once during the management planning cycle (11.1.7).

Harvesting activities shall consider types, sizes and frequency of natural disturbances as well as connectivity (5.4.4)

PEFC ST 1003, 5.2.4	NCCF STD FM 1/2017
<p>5.2.4 Forest management plans or their equivalents shall specify ways and means to minimise the risk of degradation of and damages to forest ecosystems. Forest management planning shall make use of those policy instruments set up to support these activities.</p>	<p>Criterion 3.1: “The management plan documents [shall include]:</p> <ul style="list-style-type: none"> <li>a. Environmental and social safeguards based on environmental and social assessments and management impact identification.</li> <li>b. Mitigation strategy/plan for identified social and environmental impacts”.</li> </ul> <p>Indicator 5.2.3: “Based on the results of impact assessment, the planned forest management operations shall be appropriately modified, adjusted or improved, to minimize the impact of these activities on the environment and society, and to avoid degradation of and damage to forest ecosystems and the local communities that depend on and manage them”.</p> <p>Indicator 5.3.1: “Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity”.</p> <p>Indicator 5.3.2: “The FME shall define and document Standard Operating Procedures (SoPs) for all forest management activities undertaken within the FMU and design them to reduce potential damage to forest lands or ecosystems”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes comprehensive requirements relating to mitigation of risk of forest ecosystems degradation and damages to forest ecosystems (3.1, 5.2.3, 5.3.1, 5.3.2).</p>	

PEFC ST 1003, 5.2.5	NCCF STD FM 1/2017
5.2.5 Forest management practices shall make best use of natural structures and processes and use preventive biological measures wherever and as far as economically feasible to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity shall be encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	Indicator 14.3.4: "Management practices should make best use of natural structures and processes to maintain and enhance the health and vitality of forests. Adequate genetic, species and structural diversity is encouraged and/or maintained to enhance the stability, vitality and resistance capacity of the forests to adverse environmental factors and strengthen natural regulation mechanisms".
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD FM 1/2017 requires both the usage of natural structures and processes as well as use of adequate species and structural diversity (14.3.4).	

PEFC ST 1003, 5.2.6	NCCF STD FM 1/2017
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.	Criterion 3.1: "The FME develops and maintains a written management plan (and other supporting documents), appropriate to the scale, intensity and complexity of operations, that addresses the following plan components enumerated in this criterion, as well as the provisions for protection against forest fires, pests and diseases, illegal settlement and harvesting, safeguarding archaeological sites and others. Forest management plan [includes]:  m) Fire prevention, management and suppression plan, appropriate to the scale and intensity of the fire hazard".
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD FM 1/2017 does not explicitly require to avoid usage of fires as a management technique. However, it includes several requirements relating to the protection of forests against fires.	

PEFC ST 1003, 5.2.7	NCCF STD FM 1/2017
<p>5.2.7 Appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied. The spillage of oil during forest management operations or the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be avoided, collected, stored in designated areas and removed in an environmentally-responsible manner.</p>	<p>Indicator 5.3.1: “Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity”.</p> <p>Indicator 5.3.2: “The FME shall define and document Standard Operating Procedures (SoPs) for all forest management activities undertaken within the FMU and design them to reduce potential damage to forest lands or ecosystems”.</p> <p>Indicator 5.4.2: “The management plan shall incorporate principles of landscape and ecosystem-based planning. Subject to the scale, intensity and nature of management interventions, the forest operations shall strive to maintain all naturally occurring species in their natural habitat and endeavour to maintain genetic, species and landscape level diversity”.</p> <p>Indicator 5.4.3: “The FME shall undertake forest management operations in a manner to maintain, enhance or restore natural forest composition and maintain a full range of successional stages at distributions within the range of natural variability”.</p> <p>Indicator 5.4.5: “The FME should take appropriate steps to ensure that regeneration is successful and that young stands, in both harvested areas and restoration areas, either planted or naturally established, are well-stocked with desired species, vigorous and on the trajectory to healthy stands”.</p> <p>Indicator 11.1.10: “Diversity should be introduced in plantations, wherever possible, by introducing a mix of species, provenances, clones, age classes and/or rotations, depending on the management objectives, as well as the scale and extent of the plantations”.</p> <p>Indicator 11.2.6: “The FME shall ensure that no damage to forests occur because of site disturbing activities like land preparation, tending, harvesting, road construction etc. and the natural features of the soil and its long-time productivity in the forest are maintained”.</p> <p>Indicator 11.3.6: “The FME shall have written procedures regarding</p>

	<p>a. Emergency procedures for transportation, storage, use and accidental leaking of chemicals.</p> <p>b. Disposal of the inorganic rubbish, non-recyclable waste and empty containers in a way that will not endanger the environment.</p> <p>c. Prevention and control of any chemical spillage that occurs during forest operations in an environmentally benign manner”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 requires the use of “desired species in regeneration (5.4.5) as well as protection of naturally occurring species (5.4.2, 5.4.3) and requires to use a mix of species in forest plantations (11.1.10).</p> <p>NCCF STD FM 1/2017 requires to prevent or minimise damages during forestry operations to forest ecosystems (5.3.1, 11.2.6), and to develop standard operation procedures for this purpose (5.3.2).</p> <p>NCCF STD FM 1/2017 includes requirements for waste management and for prevention and control of chemical spillage (11.3.6).</p>	

PEFC ST 1003, 5.2.8	NCCF STD FM 1/2017
5.2.8 The use of pesticides shall be minimised and appropriate silvicultural alternatives and other biological measures preferred.	<p>Criterion 11.3: “The FME ensures that all use of chemical pesticides and fertilizers shall be strictly controlled under management supervision and within the pre-defined parameters of an approved Integrated Pest Management (IPM) and Integrated Nutrient Management (INM), with an aim to progressively reduce their use over time”.</p> <p>Indicator 11.3.1: “All chemical pesticide usage in nurseries, FMUs or processing facilities shall occur within the context of an integrated pest management program. Chemical pesticides are only used when non-chemical management has been proven ineffective”.</p> <p>Indicator 11.3.2: “The FME shall demonstrate, through its policies and actions, a commitment to reduce the dependence on chemical pesticides and fungicides and progressively increase the dependence on biological, silvicultural and other non-chemical mechanisms for pest and disease control”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 requires an integrated pest management approach with controlled use of pesticides and clear objective of the pesticides use reduction (11.3, 11.3.1, and 11.3.2).</p>	

PEFC ST 1003, 5.2.9	NCCF STD FM 1/2017
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.	Indicator 11.3.4: "The FME shall ensure that a. Pesticides listed in the World Health Organization (WHO) type 1A and 1B are not be used in field or nursery operations,...".
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD FM 1/2017 prohibits the use of the WHO 1A, 1B pesticides and other toxic pesticides.	

PEFC ST 1003, 5.2.10	NCCF STD FM 1/2017
5.2.10 Pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.	Indicator 11.3.4: "The FME shall ensure that ... b. Pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) are not to be used in operations c. Chlorinated hydrocarbons and other pesticides that remain biologically active and accumulate in the food chain are be prohibited from use in the FMUs".
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD FM 1/2017 prohibits chlorinated hydrocarbons and pesticides banned by international agreement (the Stockholm Convention).	

PEFC ST 1003, 5.2.11	NCCF STD FM 1/2017
5.2.11 The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	Indicator 11.3.3: "Where the use of chemical pesticides is unavoidable, due to a lack of an alternative pest management mechanism, the FME shall a. maintains a complete list of chemical pesticides used; b. maintains records of all pesticides used, including the name of the product and active ingredient(s), location and method of application, total quantity applied, and the dates of application; c. complies with all safety regulations during the transport, manipulation, application, and storage of chemical pesticides; d. ensures that the pesticides are used in compliance with the instructions given by the pesticide user and all personnel are using



	<p>appropriate equipment and safety gear to assure safe application”;</p> <p>Indicator 3.2.2: “The FME shall ensure that the forest staff and workers are aware of their respective roles in implementation of the management plan, and are provided with appropriate training and capacity building to undertake the same as per documented mechanisms”.</p> <p>Indicator 10.4.3: “The FME should ensure the use and access to adequate safety equipment by all the employees during the implementation of the forest management operations. Appropriate training of usage of such equipment and chemicals is provided to all including safety training/usage training”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 requires safe and appropriate use of chemicals following the producer’s instructions (11.3.3), and requires records keeping on the chemical use, and comprehensive requirements to training of employees (3.2.2, 10.4, 10.4.3).</p>	

PEFC ST 1003, 5.2.12	NCCF STD FM 1/2017
5.2.12 Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	<p>Criterion 11.3: “The FME ensures that all use of chemical pesticides and fertilizers shall be strictly controlled under management supervision and within the pre-defined parameters of an approved Integrated Pest Management (IPM) and Integrated Nutrient Management (INM), with an aim to progressively reduce their use over time”.</p> <p>Indicator 11.3.5: “All use of chemical fertilizers shall occur within the ambit of an Integrated Nutrient Management (INM) plan, and the FME shall undertake a nutrient analysis of the area, before the use of any chemical fertilizers”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes requirements for controlled use of fertilisers with the aim of their minimisation.</p>	

PEFC ST 1003, 5.3.1	NCCF STD FM 1/2017
5.3.1 Forest management planning shall aim to maintain the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis.	<p>Criterion 7.3: “The FME ensures that rates and extent of forest produce extraction is maintained at levels that are sustainable, and that annual removal of forest produce is well within the limits set for each individual forest resource (i.e., either wood or non-wood)”.</p> <p>Criterion 8.1: “The FME strives towards sound and long term economic viability of forest management operations ensuring that the investments and practices necessary to maintain and improve the forest productivity are in place, while also accounting for the ecological, social and operational costs of production. (For forests managed primarily with a social mandate, or with a conservation approach, the relevant portions of the indicators dealing with economic viability of the enterprise will not be applicable)”.</p> <p>Criterion 8.2: “The FME ensures that management practices and decisions encourage the optimal utilization of forest resources, with emphasis on local value addition and processing, and strengthening of the local economy”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes requirements for sustainable production of wood and non-wood forest products (7.3); sound long-term economic viability (8.1) and optimal use of forest resources (8.2).</p>	

PEFC ST 1003, 5.3.2	NCCF STD FM 1/2017
5.3.2 Forest management planning shall aim to achieve sound economic performance taking into account any available market studies and possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	<p>Criterion 8.1: “The FME strives towards sound and long term economic viability of forest management operations ensuring that the investments and practices necessary to maintain and improve the forest productivity are in place, while also accounting for the ecological, social and operational costs of production. (For forests managed primarily with a social mandate, or with a conservation approach, the relevant portions of the indicators dealing with economic viability of the enterprise will not be applicable)”.</p> <p>Indicator 8.1.1: “The FME shall undertake short, medium and long term budgeting of its activities to include all income as well as costs associated with the forest management operations. The financial viability of the enterprise is clearly brought out in the economic model, at least in the long run, considering all social, ecological and operational costs”.</p>

	<p>Indicator 8.1.2: “The FME should have sufficient financial resources to ensure adequate investments in capital, machinery and human resources to implement the provisions of the management plan as per the budget decided in Indicator 8.1.1”.</p> <p>Indicator 8.1.3: “The FME shall undertake a periodic review (at least once during the validity of the certificate) of its management activities, including income generating activities as well as present and proposed investments, to ensure that the economic sustainability of the FME is maintained in the long term”.</p> <p>Indicator 8.3.4: “The FME may explore alternative markets for its produce including underutilized species as well as wood of lower and/or non-commercial grades”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 requirements relating to the economic performance (8.1); economic viability in financial budgeting (8.1.1); investments (8.1.2) and its review (8.1.3). Although the provision relating to “alternative” markets is not of mandatory nature, it provides an intention for the forest management.</p>	

PEFC ST 1003, 5.3.3	NCCF STD FM 1/2017
<p>5.3.3 Forest management plans or their equivalents shall take into account the different uses or functions of the managed forest area. Forest management planning shall make use of those policy instruments set up to support the production of commercial and non-commercial forest goods and services.</p>	<p>Criterion 8.4: “The FME operations recognize, maintain, and where appropriate, enhance the value of forest ecosystem functions, services and resources. The operations are regulated, monitored and controlled by the FME, as per the prevailing legal /regulatory framework and considering the ecological carrying capacity of the defined forest area”.</p> <p>Indicator 8.4.1: “The FME shall identify and document the full spectrum of ecosystem services associated with the landscape and demonstrates an awareness of and sensitivity to non-wood forest services, which may or may not be income generating”.</p> <p>Indicator 13.1.1: “The FME shall identify and document, to the extent possible, the full range of ecosystem services and functions associated with the forest area, including, forest regeneration and succession, genetic, species and ecosystem diversity, ecosystem processes, conditions and productivity, protection from soil erosion, recreation and tourism, protection of water resources and protection from adverse water impacts like floods, drought, etc”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes requirements for different functions of forests (8.4, 13.1.1).</p>	

PEFC ST 1003, 5.3.4	NCCF STD FM 1/2017
5.3.4 Forest management practices shall maintain and improve the forest resources and encourage a diversified output of goods and services over the long term.	<p>Criterion 8.2: “The FME ensures that management practices and decisions encourage the optimal utilization of forest resources, with emphasis on local value addition and processing, and strengthening of the local economy”.</p> <p>Indicator 8.2.1: “The FME should strive to establish a diversified economy based on sustainable use of various wood and non-wood forest products”.</p> <p>Indicator 8.2.2.: “The FME should promote traditional management systems where economically feasible, along with planned management activities, to encourage the optimal use of forest resources”.</p> <p>Indicator 8.2.3: “The FME shall encourage local and/or downstream processing of wood and non-wood forest products to increase the value and diversity of commercial products derived from the forest subject to cost considerations”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD FM 1/2017 includes requirements relating to the optimal use of forest resources (8.2) and diversification of production of forest products (8.2.1, 8.2.3).</p>	

PEFC ST 1003, 5.3.5	NCCF STD FM 1/2017
5.3.5 Regeneration, tending and harvesting operations shall be carried out in time, and in a way that does not reduce the productive capacity of the site, for example by avoiding damage to retained stands and trees as well as to the forest soil, and by using appropriate systems.	<p>Indicator 5.3.1: “Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity”.</p> <p>Indicator 5.3.3: “Negative impacts on the quality and quantity of water resources are should be avoided, soil and water erosion controlled, and damage to catchments within the forest avoided”.</p> <p>Indicator 5.4.5: “The FME should take appropriate steps to ensure that regeneration is successful and that young stands, in both harvested areas and restoration areas, either planted or naturally established, are well-stocked with desired species, vigorous and on the trajectory to healthy stands”.</p> <p>Indicator 8.3.1: “The FME shall ensure that harvesting operations minimize wastage and damage to standing stock”.</p>

	Indicator 8.3.5: "The FME should ensure that regeneration after harvests is timely and successful, and in a manner which restores the vitality of the forest resource prior to subsequent harvests".
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 includes requirements relating to regeneration carried out in-time (8.3.1, 5.4.5), and avoidance or minimisation of damages to forest resources (5.3.1), growing stock (8.3.1), soil and water (5.3.3).	

PEFC ST 1003, 5.3.6	NCCF STD FM 1/2017
5.3.6 Harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested forest products, with due regard to nutrient off-take.	<p>Indicator 4.1.2: "Written records shall be maintained of the periodic harvest levels of each commercial forest product, at levels of specificity appropriate to the scale and intensity of operations".</p> <p>Indicator 7.2.1: "The FME shall determine the total quantum of forest produce that can be sustainably harvested from the defined forest area. The sustainable limits for each forest produce are accordingly provisioned in the management plan".</p> <p>Indicator 7.2.2: "The FME shall define and document independent assessment methodologies and/or conventional practices that has been used to determine the sustainable harvest limits for the forest produce, based on a combination of empirical data and published literature".</p> <p>Indicator 7.3.1: "The FME shall define the harvest rates for all merchantable forest produce in the management plan for the management cycle. The harvests are maintained at a sustainable level and the resource inventory shows an increasing trend, or, at the least, are maintained at present levels in future as well".</p> <p>Indicator 7.3.2: "For natural forest management operations, the average annual harvests, either by area, volume or mass, shall not exceed the annual removable harvest limits established through Criterion 7.2, and the limits prescribed under the Management Plan".</p> <p>Indicator 7.3.3: "For plantation management, the growth and harvest rates (for thinning and final harvests), shall be based on well-documented information and/or field trials, and consistent with the observed behaviour of the species at the national or regional level. In all cases, the upper limits specified under Criterion 7.2 shall be inviolable".</p> <p>Criterion 8.2: "The FME ensures that management practices and decisions encourage</p>

	the optimal utilization of forest resources, with emphasis on local value addition and processing, and strengthening of the local economy".
<p><b>Conclusion: conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes requirements for identification of the sustainable harvest limits (7.2) that maintains the forest inventory (7.2.3) as well as for ensuring that the harvest is within those limits (7.3). The standard also requires optimal use of forest resources and forest products (8.2).</p> <p>The standard requires monitoring of forest inventory (4.1) as well as keeping records on harvest levels (4.1.2).</p>	

PEFC ST 1003, 5.3.7	NCCF STD FM 1/2017
5.3.7 Where it is the responsibility of the forest owner/manager and included in forest management, the exploitation of non-timber forest products, including hunting and fishing, shall be regulated, monitored and controlled.	<p>Criterion 7.3: "The FME ensures that rates and extent of forest produce extraction is maintained at levels that are sustainable, and that annual removal of forest produce is well within the limits set for each individual forest resource (i.e., either wood or non-wood)".</p> <p>Criterion 7.4: "Written guidelines regarding extraction of NWFPs (Non-Wood Forests Produce) are developed and records for the same maintained and monitored by the FME".</p> <p>Indicator 7.4.1: "The FME shall document guidelines for the extraction and removal of NWFPs in the management plan. The guidelines include those related to the nature of harvest/collection, fallow periods, safe levels of sustainable harvest and the intensity and frequency of harvest".</p> <p>Indicator 7.4.2: "The FME shall maintain records of the harvest/collection of NWFPs, including intensity and frequency of harvests, nature and type of extraction, harvested quantities and area of harvest".</p> <p>Indicator 7.4.3: "Harvest/collection records should be utilized by the FME for deciding subsequent harvests levels by incorporating the monitoring and inventory data to calculate a conservative harvest rate as determined by the provisions of Criterion 7.3".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes requirements for sustainable harvest of non-timber forest products (7.3) as well as defines specific requirements for control of their commercial use such as written procedures and guidelines (7.4.1), keeping records (7.4.3) and monitoring and use of non-wood forest products.</p>	

PEFC ST 1003, 5.3.8	NCCF STD FM 1/2017
<p>5.3.8 Adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.</p>	<p>Indicator 5.3.1: "Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity".</p> <p>Indicator 11.2.6: "The FME shall ensure that no damage to forests occur because of site disturbing activities like land preparation, tending, harvesting, road construction etc. and the natural features of the soil and its long-time productivity in the forest are maintained".</p> <p>Criterion 13.2: "The FME has written guidelines for protection of soil and water resources, and appropriate soil and moisture conservation measures to maintain and enhance the soil characteristics and quality of water (ground water and surface water). Further, measures to control soil erosion, run off etc. shall also be established, including, but not restricted to, stream buffer zones, road and drainage construction guidelines, slope harvest guidelines etc."</p> <p>Indicator 13.2.6: "The FME shall have written guidelines for the construction, maintenance and closure of drains and roads ensuring efficient delivery of goods and services while minimising negative impacts on the environment. within the FMUs. These guidelines should, at a minimum, conform to the state forest department and/or Public Works Department guidelines".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 requires to have written guidelines for construction, maintenance and closure of roads and drains (13.2.6) to ensure effective delivery of goods. Those activities shall take into consideration and minimise their impact on soil and water resources (5.3.1, 11.2.6, 13.2) requires minimisation of impacts during the development.</p>	

PEFC ST 1003, 5.4.1	NCCF STD FM 1/2017
5.4.1 Forest management planning shall aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic levels and, where appropriate, diversity at landscape level.	<p>Indicator 5.4.2: “The management plan shall incorporate principles of landscape and ecosystem-based planning. Subject to the scale, intensity and nature of management interventions, the forest operations shall strive to maintain all naturally occurring species in their natural habitat and endeavour to maintain genetic, species and landscape level diversity”.</p> <p>Criterion 14.1: “The FME has written guidelines for the maintenance, conservation and enhancement of biological diversity (ecosystem/landscape/species/genetic diversity) within the forest areas and strengthen the ecological integrity of the FMU”.</p> <p>Indicator 14.1.1: “The FME shall have written guidelines for the maintenance, conservation and enhancement of biological diversity (ecosystem/landscape/species/genetic diversity)”.</p> <p>Indicator 14.1.2: “The FME should incorporate the conservation of native biological diversity, including species, wildlife habitats and ecological community types at stand and landscape levels into its management activities”.</p> <p>Indicator 14.1.3: “Subject to the scale of operations, the FME shall undertake forest management operations in such a manner to maintain a full range of successional stages at distributions within the range of natural variability and restore the natural forest composition over time”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes requirements for protection of biological diversity at the ecosystem, species and genetic levels (5.4.2, 14.1) and written identification for this achieving this objective (14.1.1.).</p>	

PEFC ST 1003, 5.4.2	NCCF STD FM 1/2017
<p>5.4.2 Forest management planning, inventory and mapping of forest resources shall identify, protect and/or conserve ecologically important forest areas containing significant concentrations of:</p> <p>a) protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes;</p>	<p>Criterion 12.1: “The FME has identified and classified the High Conservation Values (HCV) attributes/special sites for conservation in the Forest Management Unit, appropriate to the scale and intensity of forest management, and manages them in a manner appropriate for their unique features”.</p> <p>Indicator 12.1.1: “The FME shall undertake periodic evaluation to identify High Conservation Values (HCV) attributes present in the FMUs, depending on the scale of the forest resource as</p>



<p>b) areas containing endemic species and habitats of threatened species, as defined in recognised reference lists;</p> <p>c) endangered or protected genetic <i>in situ</i> resources; and taking into account</p> <p>d) globally, regionally and nationally significant large landscape areas with natural distribution and abundance of naturally occurring species.</p>	<p>well as the intensity and severity of forest management operations, which includes:</p> <ul style="list-style-type: none"> <li>a. Known sites of flora and fauna associated with viable occurrences of critically endangered and endangered species and communities</li> <li>b. Typical, rare, sensitive and protected forest ecosystems</li> <li>c. Globally, regionally and nationally significant landscape areas with natural distribution area and landscape area of species.</li> <li>d. Sacred and culturally important sites</li> <li>e. Sites of critical ecological importance”.</li> </ul> <p>Indicator 12.1.2: “This evaluation, at a minimum, shall include:</p> <ul style="list-style-type: none"> <li>a. Consultation of regional or national conservation databases and maps;</li> <li>b. Consultation of the national HCVF toolkit, if it exists, or the first and third parts of the international toolkit for HCV presence (see HCVF Toolkit by WWF);</li> <li>c. Consideration of forest inventory data and observations from field workers, contractors or consultants of the FME;</li> <li>d. Interviews with biologist and scientific experts, local communities, and other stakeholders;</li> <li>e. Identification and documentation of possible threats to HCVs”.</li> </ul> <p>Criterion 12.2: “The management plan includes specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach...”.</p> <p>Indicator 12.2.1: The FME, in the management plan and its public summary, shall describe the conservation values of each area of HCV identified in the FMU, as well as the actions taken to maintain and/or enhance these values.</p> <p>Indicator 12.2.3: “The FME shall provide evidence that it implements measures to maintain and/or enhance HCVs, consistent with a precautionary approach”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 has adopted a comprehensive approach of identification of High Conservation Values that is consistent with the PEFC requirement 5.4.2. The HCV definition in the referenced HCV Toolkit (12.1.2.b) as well as attributes specified in 12.1.1a cover all four bullet points (a-d) of PEFC ST 1003, 5.4.3.</p>	

In addition, the standard includes detailed requirements for engaging stakeholders in the HCV identification (12.1.2), public availability of information on the HCV (12.2.1), description and implementation of measures for protection and enhancement of the HCVs (12.2) based on the precautionary principle.

PEFC ST 1003, 5.4.3	NCCF STD FM 1/2017
<p>5.4.3 Protected and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p>	<p>Criterion 3.1: “The management plan documents [includes]:(k) Plans for the identification, protection and regeneration of rare, threatened and endangered species, habitats and ecosystems”.</p> <p>Indicator 11.1.4: “Rare, threatened and endangered species and their habitats or distribution areas within the FMU shall be identified, demarcated as protection zones and marked on maps”.</p> <p>Indicator 12.1.1: “The FME shall undertake periodic evaluation to identify High Conservation Values (HCV) attributes present in the FMUs, depending on the scale of the forest resource as well as the intensity and severity of forest management operations, which includes: (a) known sites of flora and fauna associated with viable occurrences of critically endangered and endangered species and communities”.</p> <p>Criterion 14.2: “The FME undertakes an assessment of the rare, threatened, endemic and endangered species and their habitats occurring within the defined forest area along with a listing of species prone to overexploitation in the forest area. Safeguards exist which protect rare, threatened and endangered species and their habitats. The FME has established conservation zones and protection areas, appropriate to the uniqueness of the affected resources and the scale and intensity of forest management”.</p> <p>Indicator 14.2.1: “The FME shall undertake an assessment of the rare, threatened, endemic and endangered species and their habitats within the FMU along with a listing of species prone to overexploitation in the forest area”.</p> <p>Indicator 14.2.2: “Management guidelines to identify and protect endangered, endemic, rare and threatened species of forest flora and fauna, including features of special biological interest and representative conservation and protection areas, in accordance with existing forest ecosystems, appropriate to the scale and intensity of forest management shall be established and documented by the FME”.</p>

**Conclusion: Conformity**

**Justification:** NCCF TD FM 1/2017 includes comprehensive requirements for protection of threatened or protected species and their habitats. The plan for identification and protection of the species shall be include in the FMP (3.1k), the areas with the species shall be identified as the HCVs (12.2.2 a), the presence of the species shall be identified within the FMU (11.1.4, 14.2.1) and protected, including their habitats though conservation zones (14.2).

The standard ensures that the protected and threatened species are not commercially exploited.

PEFC ST 1003, 5.4.4	NCCF STD FM 1/2017
5.4.4 Forest management shall ensure successful regeneration through natural regeneration or, where not appropriate, planting that is adequate to ensure the quantity and quality of the forest resources.	<p>Criterion 4.1: "Appropriate to the scale and intensity of operations, forest management activities include the research and data collection to monitor the following attributes: (a) Growth rates and condition of the forest, including degradation, regeneration and restoration/rehabilitation".</p> <p>Criterion 5.4: "Ecological functions and values are maintained intact, enhanced, or restored, including: (a) Forest regeneration and succession, ...".</p> <p>Indicator 5.4.5: "The FME should take appropriate steps to ensure that regeneration is successful and that young stands, in both harvested areas and restoration areas, either planted or naturally established, are well-stocked with desired species, vigorous and on the trajectory to healthy stands".</p> <p>Indicator 8.3.5: "The FME should ensure that regeneration after harvests is timely and successful, and in a manner which restores the vitality of the forest resource prior to subsequent harvests".</p>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 requires timely and successful regeneration (5.4.5, 8.3.5) with suitable species (5.4.5). The monitoring of forest resources shall also include regeneration success (4.1a).	

PEFC ST 1003, 5.4.5	NCCF STD FM 1/2017
5.4.5 For reforestation and afforestation, origins of native species and local provenances that are well-adapted to site conditions shall be preferred, where appropriate. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimised.	<p>Indicator 5.4.5: "The FME should take appropriate steps to ensure that regeneration is successful and that young stands, in both harvested areas and restoration areas, either planted or naturally established, are well-stocked with desired species, vigorous and on the trajectory to healthy stands".</p> <p>Indicator 11.1.8: "The FME should promote afforestation and reforestation activities that contribute to the improvement and restoration of</p>

	<p>ecological health, with a preference for natural regeneration of native species over artificial regeneration, with a target of achieving stem density levels of well stocked forests of similar forest type”.</p> <p>Indicator 11.1.10: “Diversity should be introduced in plantations, wherever possible, by introducing a mix of species, provenances, clones, age classes and/or rotations, depending on the management objectives, as well as the scale and extent of the plantations”.</p> <p>Criterion 11.5: “Introduction of exotics in natural forest areas as well as plantations within natural forest areas within the FME is prohibited. In the case of farm forestry/ plantations outside natural forest areas/TOFs, the FME assesses the ecological impacts of the introduction of exotic species, and their introduction and propagation are strictly controlled, subject to protocols under applicable laws”.</p> <p>Indicator 11.5.1: “The FME shall not permit the introduction of exotic species in natural forests. Introduction of exotics is permitted only in plantations and not in natural forests”.</p> <p>Indicator 11.5.2: “Introduction of exotic species by the FME shall be undertaken only after a review of the ecological impacts of introduction and/or empirical or research data to support the introduction of the species. It needs to be proved that indigenous species are unable to meet the management objectives”.</p> <p>Indicator 11.5.3: “The FME shall verify, through scientifically researched data, prior to introduction, that the proposed species do not adversely affect the environment and biodiversity of the region and are not invasive in the long run. Outcome of introduction of the proposed exotic species in similar eco-regions is also studied to understand the positive and negative implications of this introduction”.</p> <p>Indicator 11.5.4: “In areas where previously introduced exotics have been found to be problematic and/or invasive in nature, the FME shall implement control measures. This includes, but is not limited to, phasing out of exotics from the region, promotion of indigenous species and permitting the indigenous species to regenerate and recapture the space from exotics”.</p> <p>Indicator 11.5.5: “FME shall conduct periodic monitoring of the adaptability of exotic stands, as indicated by measured levels of mortality, disease and insect outbreaks”.</p> <p>Indicator 11.5.6: “For all exotics used in plantations, the management plan, or any other</p>
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	suitable document, shall record the seed source and provenance or the clone details".
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 includes requirements for the use of "desired species" in the reforestation (5.4.5); preference of natural regeneration of native species (11.1.8) and a mix of species, provenances, clones, age classes and/or rotations in forest plantations (11.1.10). NCCF TD FM 1/2017 includes comprehensive requirements for the use of exotic (introduced species) (11.5) that prohibit the use of the exotic species in natural forests (11.5.1). In case of forest plantations, the exotic species can only be used after evaluation of their ecological impacts and review of scientific data (11.5.2, 11.5.3) and in a control manner (11.5.4), including monitoring of their impacts (11.5.5).	

PEFC ST 1003, 5.4.6	NCCF STD FM 1/2017
5.4.6 Afforestation and reforestation activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	<p>Indicator 5.4.4: "Harvesting should be designed and laid out, over time and space, with consideration of the types, sizes and frequency of natural disturbances as well as connectivity of wildlife habitats".</p> <p>Indicator 11.1.5: "If it is not practically possible to clearly map the protection zones and biological corridors in an FMU, or in the surrounding landscape, then the FME shall ensure that adequate areas are retained for each forest type, keeping in mind general areas of occurrence and wildlife migration patterns in the forest".</p> <p>Indicator 11.1.8: "The FME should promote afforestation and reforestation activities that contribute to the improvement and restoration of ecological health, with a preference for natural regeneration of native species over artificial regeneration, with a target of achieving stem density levels of well stocked forests of similar forest type".</p> <p>Indicator 11.2.7: "Where damage/degradation of the forest has occurred due to past management activities, the FME shall initiate steps to regenerate the forest and restore the ecological functions and values to a natural state which is typical to the locality".</p>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 requires protection of ecological connectivity (5.4.4), areas of wildlife migration (11.1.5); restoration of ecological health by reforestation activities (11.1.8) and restoration of ecological functions and values in damages/degraded forests.	

PEFC ST 1003, 5.4.7	NCCF STD FM 1/2017
5.4.7 Genetically-modified trees shall not be used.	<p>Indicator 11.4.3: “The use (defined as commercial use as well as for research purposes) of genetically modified organisms within the FMU shall not be permitted under any circumstances”.</p> <p><b>Genetically Modified Organisms</b>  An organism in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination. (Source: Based on FSC-POL-30-602 FSC Interpretation on GMO (Genetically Modified Organisms)).</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 satisfies the requirement as it explicitly prohibits the use of genetically modified tree species.</p> <p>The definition of genetically modified trees in chapter Glossary is identical with the PEFC definition in PEFC ST 1003.</p>	

PEFC ST 1003, 5.4.8	NCCF STD FM 1/2017
5.4.8 Forest management practices shall, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices shall also aim to maintain and restore landscape diversity.	<p>Indicator 5.4.3: “The FME shall undertake forest management operations in a manner to maintain, enhance or restore natural forest composition and maintain a full range of successional stages at distributions within the range of natural variability”.</p> <p>Indicator 11.1.3: “Representative samples of existing ecosystems within the FMU shall be delineated on maps designated as such on the ground, and conservation practices and policies included in the management plan. Where existing legal measures to conserve these landscapes are insufficient, the FME shall take actions to assist in the protection of such areas”.</p> <p>Indicator 14.1.2: “The FME should incorporate the conservation of native biological diversity, including species, wildlife habitats and ecological community types at stand and landscape levels into its management activities”.</p> <p>Indicator 14.1.4 “Forest management practices, where appropriate, shall 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 also aim to maintain and restore landscape diversity”.</p> <p>Indicator 14.1.6: “Any non-forested wetlands/grasslands and its constituent elements, which are found associated with the</p>

	forest area (both within and in the periphery) shall be protected and demarcated on maps”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 requires protection of native biological diversity (14.1.2, 5.4.3), promotion of diversity by horizontal and vertical structures, uneven-aged stands and diversity of species (14.1.4), protection of wetlands (14.1.6), and a representative sample of existing ecosystems (11.1.3).	

PEFC ST 1003, 5.4.9	NCCF STD FM 1/2017
5.4.9 Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported, when economically feasible.	<p>Indicator 8.2.2.: “The FME should promote traditional management systems where economically feasible, along with planned management activities, to encourage the optimal use of forest resources”.</p> <p>Criterion 9.3: “Traditional knowledge of forest dwellers*(to be read in conjunction with local communities and tribals) regarding the use of forest species or traditional management systems is acknowledged and documented and any use of such knowledge in forest operations is fairly compensated. The compensation for the same shall be formally agreed upon with their free, prior and informed consent before the commencement of forest operations”.</p> <p>Indicator 9.3.1: “Any use of traditional knowledge of forest dwellers in forest operations w.r.t use of forest species, management systems or forest products and services shall be documented by the FME”.</p>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 includes requirements promoting the traditional management systems (8.2.2) and documentation of the traditional knowledge of local communities and tribes (9.3.1).	

PEFC ST 1003, 5.4.10	NCCF STD FM 1/2017
5.4.10 Tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to improve or maintain biological diversity.	<p>Indicator 5.3.1: “Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity”.</p> <p>Indicator 11.2.6: “The FME shall ensure that no damage to forests occur because of site disturbing activities like land preparation, tending, harvesting, road construction etc. and</p>

	<p>the natural features of the soil and its long-time productivity in the forest are maintained”.</p> <p>Indicator 14.3.5: “The impacts of forest management operations on biodiversity levels in the FMU shall be assessed to determine whether the operations maintain, diminish or enhance the biodiversity attributes of the forest area”.</p> <p>Indicator 14.3.6: “If there is a net negative impact of forest operations on the biodiversity attributes, either inadvertently, or due to unavoidable reasons (to be determined by the certification body) the FME shall mitigate the negative impacts, based on severity of impact, by utilization of the following hierarchy viz.,</p> <ol style="list-style-type: none"> <li>Avoidance of impact</li> <li>Minimization of impact</li> <li>Restoration/Rehabilitation of biodiversity attributes</li> <li>Additional Conservation Actions”.</li> </ol>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 requires prevention and minimisation of damages to forest resources (5.3.1, 11.2.6) and to the biodiversity (14.3.6).</p>	

PEFC ST 1003, 5.4.11	NCCF STD FM 1/2017
<p>5.4.11 Infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.</p>	<p>Indicator 5.3.1: “Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity”.</p> <p>Indicator 11.2.6: “The FME shall ensure that no damage to forests occur because of site disturbing activities like land preparation, tending, harvesting, road construction etc. and the natural features of the soil and its long-time productivity in the forest are maintained”.</p> <p>Criterion 13.2: “The FME has written guidelines for protection of soil and water resources, and appropriate soil and moisture conservation measures to maintain and enhance the soil characteristics and quality of water (ground water and surface water). Further, measures to control soil erosion, run off etc. shall also be established, including, but not restricted to, stream buffer zones, road and drainage construction guidelines, slope harvest guidelines etc”.</p> <p>Indicator 13.2.6: “The FME shall have written guidelines for the construction, maintenance</p>



	and closure of drains and roads ensuring efficient delivery of goods and services while minimising negative impacts on the environment. within the FMUs. These guidelines should, at a minimum, conform to the state forest department and/or Public Works Department guidelines”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 requires to have written guidelines for construction, maintenance and closure of roads and drains (13.2.6). Those activities shall take into consideration and minimise their impact on soil and water resources (5.3.1, 11.2.6, 13.2) requires minimisation of impacts during the development.	

PEFC ST 1003, 5.4.12	NCCF STD FM 1/2017
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.	<p>Criterion 3.1: “The FME develops and maintains a written management plan (and other supporting documents), appropriate to the scale, intensity and complexity of operations, that addresses the following plan components enumerated in this criterion, as well as the provisions for protection against forest fires, pests and diseases, illegal settlement and harvesting, safeguarding archaeological sites and others. The management plan documents:</p> <p>n) Assess the problem of grazing and measures to avoid overgrazing to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity”.</p> <p>Indicator 11.1.7: “The FME shall periodically (based on the scale and intensity of forest management operations and extent of forest resource, but at least once during the management plan cycle) monitor 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”.</p>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 includes requirement for assessing the impact of grazing, identification of measures to avoid negative impacts of animal populations and overgrazing (3.1n) and for monitoring of the overgrazing (11.1.7).	

PEFC ST 1003, 5.4.13	NCCF STD FM 1/2017
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.	<p>Indicator 14.1.5: “The FME, in its practices, shall be guided by regionally based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, downed woody debris and nest trees”.</p> <p>Indicator 14.3.3: “Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be retained in the FMUs, as much as possible in quantities and distribution necessary to safeguard biodiversity (while accounting for the potential effect on the health and stability of the forest and on surrounding ecosystems)”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes requirements for stand-level wildlife habitats (snags, stumps, nest trees, etc.) (14.1.5) and standing and fallen dead wood, hollow trees, old groves and special rare trees (14.3.3).</p>	

PEFC ST 1003, 5.5.1	NCCF STD FM 1/2017
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.	<p>Indicator 5.4.1: “The FME shall describe the known ecological functions and values in the management plan and update them periodically as and when the additional information is acquired”.</p> <p>Criterion 8.4: “The FME operations recognize, maintain, and where appropriate, enhance the value of forest ecosystem functions, services and resources. The operations are regulated, monitored and controlled by the FME, as per the prevailing legal /regulatory framework and considering the ecological carrying capacity of the defined forest area”.</p> <p>Criterion 13.1: “The FME identifies all ecosystem services and functions associated with the forest area, including, among others, forest regeneration and succession, genetic, species and ecosystem diversity, ecosystem processes, conditions and productivity, protection from soil erosion, protection of water resources and protection from adverse water impacts like floods, drought etc”.</p> <p>Indicator 13.1.1: “The FME shall identify and document, to the extent possible, the full range of ecosystem services and functions associated with the forest area, including, forest regeneration and succession, genetic, species and ecosystem diversity, ecosystem processes, conditions and productivity, protection from soil erosion, recreation and tourism, protection of</p>

	water resources and protection from adverse water impacts like floods, drought, etc”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 requires to recognise and identify ecological functions and values of forests and ecosystems services (5.4.1, 8.4, 13.1), including protection from soil erosion, recreation and tourism, protection of water resources and protection from adverse water impacts like floods, drought, etc. (13.1.1).	

PEFC ST 1003, 5.5.2	NCCF STD FM 1/2017
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.	<p>Indicator 12.1.1: “The FME shall undertake periodic evaluation to identify High Conservation Values (HCV) attributes present in the FMUs, depending on the scale of the forest resource as well as the intensity and severity of forest management operations, which includes...(e) Sites of critical ecological importance”.</p> <p>Glossary: “HCV 4 - Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes”.</p> <p>Indicator 12.2.3: “The FME shall provide evidence that it implements measures to maintain and/or enhance HCVs, consistent with a precautionary approach”.</p> <p>Indicator 13.1.1: “The FME shall identify and document, to the extent possible, the full range of ecosystem services and functions associated with the forest area, including, forest regeneration and succession, genetic, species and ecosystem diversity, ecosystem processes, conditions and productivity, protection from soil erosion, recreation and tourism, protection of water resources and protection from adverse water impacts like floods, drought, etc”.</p> <p>Criterion 13.2: “The FME has written guidelines for protection of soil and water resources, and appropriate soil and moisture conservation measures to maintain and enhance the soil characteristics and quality of water (ground water and surface water). Further, measures to control soil erosion, run off etc. shall also be established, including, but not restricted to, stream buffer zones, road and drainage construction guidelines, slope harvest guidelines etc”.</p> <p>Indicator 13.2.4: Soil types within the forest area are shall be” mapped and taken into consideration while undertaking forest operations”.</p>

**Conclusion: Conformity**

**Justification:** NCCF TD FM 1/2017 includes a comprehensive approach of identification (12.1) and protection (12.2) of HCVs. HCV 4 covers areas with specific and recognised protective functions for society (water, soil).

In addition, the Standard includes requirements for identification and protection of ecological values and functions relating to protection of water resources and soil (13.1.1, 13.2).

PEFC ST 1003, 5.5.3	NCCF STD FM 1/2017
<p>5.5.3 Special care shall be given to silvicultural operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery shall be avoided in such areas. Special measures shall be taken to minimise the pressure of animal populations.</p>	<p>Indicator 12.2.3: "The FME shall provide evidence that it implements measures to maintain and/or enhance HCVs".</p> <p>Glossary: "HCV 4 - Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes".</p> <p>Indicator 13.2.1: "The FME shall have written guidelines for the protection of water resources and water quality protection and minimization of soil erosion because of site disturbing activities. These guidelines shall be in conformance to any legal requirements in place".</p> <p>Indicator 13.2.4: "Soil types within the forest area are shall be mapped and taken into consideration while undertaking forest operations. All forest operations are managed to protect and maintain the physical, chemical and biological properties of soil and improve them where appropriate and reasonably practicable".</p> <p>Indicator 13.2.5: "The FME shall specified the maximum extent of slope beyond which no felling or harvest is permitted. Under no circumstances should the permissible slope extend beyond 35 degrees".</p>
<b>Conclusion: Conformity</b> <p><b>Justification:</b> NCCF TD FM 1/2017 includes a comprehensive approach of identification (12.1) and protection (12.2) of HCVs. HCV 4 covers areas with specific and recognised protective functions for society, including protection against soil erosion.</p> <p>In addition, the Standard includes specific requirement for soil protection, written guidelines for minimisation of soil erosion (13.2.1), mapping and consideration of soil types and protection of soli properties (13.2.4), prohibition of harvesting on steep slopes (13.2.5).</p>	

PEFC ST 1003, 5.5.4	NCCF STD FM 1/2017
<p>5.5.4 Special care shall be given to forest management practices in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided.</p>	<p>Indicator 5.3.3: “Negative impacts on the quality and quantity of water resources are should be avoided, soil and water erosion controlled, and damage to catchments within the forest avoided”.</p> <p>Indicator 5.3.4: “The FME shall define the width of buffer zones to conserve water and soil at the banks of rivers and streams or around water bodies. These zones should be as per existing local guidelines, or, in their absence, based on available scientific data, keeping in mind precautionary principle”.</p> <p>Indicator 5.3.5: “Buffer zones defined as per indicator 5.3.4 above shall be established and marked in the forest map or the forest operational design”.</p> <p>Indicator 11.2.8: “The FME shall take steps to ensure that quality and quantity of water resources are protected and soil and water erosion minimized by</p> <ol style="list-style-type: none"> <li>Establishing buffer zones to conserve water and soil at the banks of rivers and streams or around water bodies; these buffer zones are marked on the FMU maps.</li> <li>Avoiding damage to catchments within and outside the forest”.</li> </ol> <p>Indicator 12.2.3: “The FME shall provide evidence that it implements measures to maintain and/or enhance HCVs”.</p> <p>Glossary: “HCV 4 - Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes”.</p> <p>Indicator 13.2.1: “The FME shall have written guidelines for the protection of water resources and water quality protection and minimization of soil erosion because of site disturbing activities. These guidelines shall be in conformance to any legal requirements in place”.</p> <p>Indicator 13.2.2: “All forest operations shall be designed to minimize adverse changes to water quality (physical, chemical or biological) with the objectives of:</p> <ol style="list-style-type: none"> <li>minimizing transport of soil into waterways;</li> <li>maintaining streamside management zones; and</li> </ol>

	<p>c. specifying the buffer zone from water bodies”.</p> <p>Indicator 13.2.3: “All stream courses passing through the FMUs shall be identified and demarcated on maps”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes several requirements for protection of water resources by minimising negative impacts of forestry operations on water resources (5.3.3, 13.2.2), establishing of buffer zones around water sources (5.4.4, 5.4.5, 11.2.8, 13.2.2), protecting NHCV 4 (12.2.3), written guidelines for protection of water resources and water quality (13.2.1), and identification of all stream crossings (13.2.3).</p>	

PEFC ST 1003, 5.5.5	NCCF STD FM 1/2017
<p>5.5.5 Construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>	<p>Indicator 5.3.1: “Effective measures shall be taken to prevent, and where unavoidable minimize the damage to forest areas caused by anthropogenic activities such as land preparation and uprooting, tending, forest harvesting, regeneration, road construction etc. to maintain the natural features of the soil and its long-term productivity”.</p> <p>Indicator 11.2.6: “The FME shall ensure that no damage to forests occur because of site disturbing activities like land preparation, tending, harvesting, road construction etc. and the natural features of the soil and its long-time productivity in the forest are maintained”.</p> <p>Criterion 13.2: “The FME has written guidelines for protection of soil and water resources, and appropriate soil and moisture conservation measures to maintain and enhance the soil characteristics and quality of water (ground water and surface water). Further, measures to control soil erosion, run off etc. shall also be established, including, but not restricted to, stream buffer zones, road and drainage construction guidelines, slope harvest guidelines etc”.</p> <p>Indicator 13.2.6: “The FME shall have written guidelines for the construction, maintenance and closure of drains and roads ensuring efficient delivery of goods and services while minimising negative impacts on the environment. within the FMUs. These guidelines should, at a minimum, conform to the state forest department and/or Public Works Department guidelines”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 requires to have written guidelines for construction, maintenance and closure of roads and drains (13.2.6). Those activities shall take into consideration</p>	

and minimise their impact on soil and water resources (5.3.1, 11.2.6, 13.2) requires minimisation of impacts during the development.

PEFC ST 1003, 5.6.1	NCCF STD FM 1/2017
5.6.1 Forest management planning shall aim to respect the multiple functions of forests to society, give due regard to the role of forestry in rural development, and especially consider new opportunities for employment in connection with the socio-economic functions of forests.	<p>Criterion 8.2: "The FME ensures that management practices and decisions encourage the optimal utilization of forest resources, with emphasis on local value addition and processing, and strengthening of the local economy".</p> <p>Indicator 9.2.1: "The FME shall provide opportunities of employment, training and other social services to the forest dwellers, tribals and local communities".</p> <p>Indicator 9.2.2: "The FME shall contribute to developing training programs to enhance the skill sets and capabilities of the local communities and tribals and undertakes discussions with representatives of local communities about the identification of opportunities in employment, contracting, trading and value addition".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes requirements for socio-economic functions, including rural development (8.2), employment (9.2.1, 9.2.2), environmental services, Principle 13, etc.</p>	

PEFC ST 1003, 5.6.2	NCCF STD FM 1/2017
5.6.2 Forest management shall promote the long-term health and well-being of communities within or adjacent to the forest management area.	<p>Indicator 6.3.2: "The FME should identify actions within its operational scope which would lead to climate change mitigation and/or promoting climate change adaptation potential of the forest dependent communities".</p> <p>Indicator 9.1.1: "The FME shall identify and document the various forest dweller groups, tribals and local communities associated with the forest area in the scope of the certificate".</p> <p>Criterion 9.2: "The FME identifies and provides opportunities for employment, training and other social services to the forest dwellers, tribals and local communities".</p> <p>Indicator 9.2.1: "The FME shall provide opportunities of employment, training and other social services to the forest dwellers, tribals and local communities".</p> <p>Indicator 9.2.2: "The FME shall contribute to developing training programs to enhance the skill sets and capabilities of the local communities and tribals and undertakes discussions with representatives of local communities about the identification of</p>

	opportunities in employment, contracting, trading and value addition”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 includes a number of requirements relating to various forest dweller groups, tribals and local communities, including their identification (9.1.1); employment opportunities (9.2, 9.2.1), training and other social services (9.2.1, 9.2.2) and their adaptation to climate change (6.3.2).	

PEFC ST 1003, 5.6.3	NCCF STD FM 1/2017
5.6.3 Property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area. Likewise, legal, customary and traditional rights related to the forest land shall be clarified, recognised and respected.	<p>Indicator 1.1.2: “The FME shall comply with all laws applicable to forest management, including laws related to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land and resource rights for indigenous people and forest dependent communities; health, labour and safety issues; and payment of royalties and taxes”.</p> <p>Indicator 2.1.1: “The FME shall have clear and legally secure land tenure and use rights to the forest resource”.</p> <p>Criterion 2.2: “Local communities with legal or customary/traditional tenure or rights maintain control over forest operations and resources (to the extent necessary to protect said rights or resources), unless they delegate control with free, prior and informed consent to the state or other agencies. In case of state owned forest lands, rights of all concerned stakeholders would be identified and documented. In cases where the rights have been settled, notifications to the effect of rights settlement are made available and orders of the competent authorities are provided”.</p> <p>Indicator 2.2.1: “The FME shall identify the tribals, local communities, forest dwellers and/or other stakeholders with legal and/or customary/traditional rights to the forest and describe the nature and extent of these rights in the management plan”.</p>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 requires the FME to have clear and legally secure land use rights (2.1.1) and to identify and respect customary/traditional tenure or rights of local communities (2.2, 2.2.1).	



PEFC ST 1003, 5.6.4	NCCF STD FM 1/2017
<p>5.6.4 Forest management activities shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration of the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved or is in dispute there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>	<p>Indicator 2.2.1: "The FME shall identify the tribals, local communities, forest dwellers and/or other stakeholders with legal and/or customary/traditional rights to the forest and describe the nature and extent of these rights in the management plan".</p> <p>Indicator 2.2.2: "When communities have delegated control of their rights or use in whole or in part, in a manner authorised by law, this shall be confirmed by documented agreements and/or interviews with representatives of local communities".</p> <p>Indicator 2.2.3: "When the legal or customary/traditional tenure or rights over resources have been settled legally (in case of state owned forest lands), the notifications to the effect of rights settlement shall be available and orders of the competent authorities regarding rights or tenure settlement shall be provided".</p> <p>Indicator 2.2.4: "Allocation of duly recognized legal or customary rights by local communities to other parties' shall be documented, with evidence of free, prior and informed consent".</p> <p>Indicator 2.3.1: "Conflicts over land tenure and rights shall be resolved in a systematic manner through appropriate mechanisms, with preference to voluntary and conciliatory methods over adjudication/arbitration or other legal mechanisms".</p> <p>Indicator 2.3.2: "The FME shall record all such conflicts and their mode of resolution (along with outcomes), to avoid further litigation, as well as to set precedents for similar conflicts in future".</p> <p>Indicator 2.3.3: "The magnitude and severity of unresolved tenure claims and rights disputes shall be minor, relative to the scale of forest management operations. For all such unresolved or outstanding disputes, the FME shall ensure that the circumstances and present status of the dispute and all steps/mechanisms engaged in dispute resolution are documented".</p> <p>Criterion 9.1: "The FME recognizes and respects the rights of forest dwellers, tribals and other forest dependent communities".</p> <p>Indicator 9.1.1: "The FME shall identify and document the various forest dweller groups, tribals and local communities associated with the forest area in the scope of the certificate".</p> <p>Indicator 9.1.2: "The FME shall assess and document the rights of forest dwellers, tribals and</p>

	<p>local communities in the forest area and respects and recognizes these rights”.</p> <p>Indicator 9.1.3: “The FME shall have a written commitment, signed by the top management of the FME, that it recognizes and respects the rights of forest dwellers, tribals and local communities”.</p> <p>Indicator 9.1.4: “Any complaints or grievances related to infringement of rights of forest dwellers, tribals and local communities shall be recorded and addressed by the FME on a priority basis”.</p> <p>Indicator 9.5.1: “The FME shall ensure that forest management operations (in forests vested with rights) do not threaten or diminish, either directly or indirectly, the resources and rights of the local communities, forest dwellers and tribals. Appropriate measures shall be taken to avoid the loss of or damage to the legal right, property, resources, or livelihood of local communities, tribals or other forest dwellers”.</p> <p>Indicator 9.5.2: “Where evidence exists that the resources and rights of local communities, forest dwellers and tribals has been violated by forest management operations, the FME shall undertake steps to resolve this violation, and document the steps followed”.</p> <p>Indicator 9.5.3: “The FME shall record all instances of damage to resources and rights, including any grievances/complaints in this regard, as well as the list of affected parties”.</p> <p>Indicator 9.5.4: “In cases of loss or damage to property, resources, livelihood or rights of local communities, tribals and forest dwellers, the issue shall be addressed through the provisions of legal recourse, as applicable”.</p> <p>Indicator 9.5.5: “In cases where compensation for such loss is not covered by legal frameworks, the FME shall undertake appropriate and documented procedures, mutually agreed upon through FPIC with the affected parties, for resolving these grievances and providing a fair, equitable outcome to these affected parties”.</p> <p>Indicator 9.5.6: “The FME shall have written procedures for calculating and providing a fair, equitable compensation for such damages, based on an assessment into the type, severity, scale and intensity of loss or negative impact as well as consultation with local communities, undertaken through an FPIC process.”</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 does not have specific requirements for indigenous/aboriginal people but provides requirements that are applicable to “local communities, tribals and forest dwellers”. The term covers and is broader than the scope of the PEFC requirement 5.6.4.</p>	

NCCF TD FM 1/2017 makes neither reference to ILO 169 nor to the UN Declaration of the Rights of Indigenous People. However, the content of the Standard satisfies the PEFC requirement and the spirit of the international documents:

NCCF TD FM 1/2017 requires:

- identification the tribals, local communities, forest dwellers and/or other stakeholders with legal and/or customary/traditional rights (2.2.1, 9.1.1); recognition of their customary/traditional rights (9.1.2); including written commitment of the FME's top management (9.1.3);
- FME to demonstrate when it obtained the control over the customary/traditional rights in a manner authorised by law (2.2.2);
- Evidence of FPIC when customary rights have been allocated by local communities to other party (2.2.4);
- Resolution of conflicts over land tenure and rights through appropriate mechanisms (2.3.3), to be documented and resolved in priority manner (9.1.4);
- Forestry operations not to threaten or diminish rights of the tribals, local communities, forest dwellers (9.5.1); any apparent violation to be resolved (9.5.2); and recorded (9.5.3);
- Fair compensation for loss or damage to property, resources, livelihood or rights of local communities, tribals and forest dwellers (9.5.4, 9.5.5, 9.5.6), including an FPIC process.

PEFC ST 1003, 5.6.5	NCCF STD FM 1/2017
<p>5.6.5 Adequate public access to forests for the purpose of recreation shall be provided taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.</p>	<p>Indicator 2.2.1: "The FME shall identify the tribals, local communities, forest dwellers and/or other stakeholders with legal and/or customary/traditional rights to the forest and describe the nature and extent of these rights in the management plan".</p> <p>Indicator 9.6.4: "The FME shall recognize and respect the rights of indigenous/local communities to protect and manage sites of special cultural, ecological, economic, recreational, heritage or religious significance and allows adequate access to these sites to the communities taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest".</p> <p>Indicator 13.1.1: "The FME shall identify and document, to the extent possible, the full range of ecosystem services and functions associated with the forest area, including, forest regeneration and succession, genetic, species and ecosystem diversity, ecosystem processes, conditions and productivity, protection from soil erosion, recreation and tourism, protection of water resources and protection from adverse water impacts like floods, drought, etc".</p> <p>Indicator 13.1.2: "The FME should identify the ecosystem services attributable to the FME (as defined by the Millennium Ecosystem Assessment, 2006):... Cultural services: includes nonmaterial benefits people obtain from ecosystems through spiritual enrichment,</p>

	cognitive development, reflection, recreation, and aesthetic experiences”.
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 ensure access of indigenous/ local communities to their historical, spiritual sites, economic, recreational and cultural sites (9.6.4). It can also be expected that the traditional/customary rights of local communities/dwellers and tribals that are protected by the standard also include an access to forest resources.</p> <p>In addition, the standard also requires to identify recreational, touristic and cultural values (13.1.1, 13.1.2). As those values are dependent on accessibility of the forests, the standard implicitly requires identification of areas with the public access and requires the forests to remain accessible.</p>	

PEFC ST 1003, 5.6.6	NCCF STD FM 1/2017
5.6.6 Sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the basic needs of local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.	<p>Criterion 9.6: “Sites of special cultural, spiritual, heritage, religious, ecological, or economic, significance to forest dependent communities are clearly identified in cooperation with such people, and recognized and protected by the FME. The rights of indigenous/local communities to protect such sites is recognized and respected by the FME”.</p> <p>Indicator 9.6.1: “The FME, with the participation of forest communities and other stakeholders, shall identify, map and where possible demarcate on ground, the sites of special cultural, ecological, economic or religious significance to forest dependent communities”.</p> <p>Indicator 9.6.2: “The management plan shall contain written policies for the identification and protection of such sites of special significance and FME staff shall be appropriately trained in protection of such sites”.</p> <p>Indicator 9.6.3: “Findings of special sites of archaeological interest are communicated to the appropriate authorities and the FME shall abide by the restrictions on use imposed by these authorities for said areas”.</p> <p>Indicator 9.6.4: “The FME shall recognize and respect the rights of indigenous/local communities to protect and manage sites of special cultural, ecological, economic, recreational, heritage or religious significance and allows adequate access to these sites to the communities taking into account respect for ownership rights and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 requires identification, protection and access to sites of cultural, ecological, recreational historical and spiritual significance (9.6).</p>	

PEFC ST 1003, 5.6.7	NCCF STD FM 1/2017
<p>5.6.7 Forest management operations shall take into account all socio-economic functions, especially the recreational function and aesthetic values of forests by maintaining for example varied forest structures, and by encouraging attractive trees, groves and other features such as colours, flowers and fruits. However, this shall be done in a way and to an extent that does not lead to serious negative effects on forest resources, and forest land.</p>	<p>Indicator 13.1.1: “The FME shall identify and document, to the extent possible, the full range of ecosystem services and functions associated with the forest area, including, forest regeneration and succession, genetic, species and ecosystem diversity, ecosystem processes, conditions and productivity, protection from soil erosion, recreation and tourism, protection of water resources and protection from adverse water impacts like floods, drought, etc”.</p> <p>Indicator 13.1.2: “The FME should identify the ecosystem services attributable to the FME (as defined by the Millennium Ecosystem Assessment, 2006):</p> <ul style="list-style-type: none"> <li>a. Provisioning services: includes products obtained from ecosystems viz., food, raw materials, genetic resources, water, minerals, medicinal plants etc.</li> <li>b. Regulating services: includes benefits obtained from ecosystem services viz., carbon sequestration, climate regulation, waste decomposition and detoxification, air and water purification, pest and disease control etc.</li> <li>c. Cultural services: includes nonmaterial benefits people obtain from ecosystems through spiritual enrichment, cognitive development, reflection, recreation, and aesthetic experiences</li> <li>d. Supporting services: includes services “that are necessary to produce all other ecosystem services”. These include services such as nutrient recycling, primary production and soil formation. These services make it possible for the ecosystems to provide services such as food supply, flood regulation and water purification”.</li> </ul> <p>Indicator 13.1.3: “All threats to the continued existence of these services should be identified and suitable measures, wherever possible, to mitigate such threats put in place”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 requires to identify and document various socio-economic functions, including provisioning, regulating, cultural and supporting services (13.1.1, 13.1.2). The standard also makes an explicit reference to the identification to functions relating to “recreation and tourism” (13.1.1) and spiritual enrichment, cognitive development, reflection, recreation, and aesthetic experiences (13.2.2, cultural functions) and to mitigate threats to the continued existence of those functions (13.1.3).</p>	

PEFC ST 1003, 5.6.8	NCCF STD FM 1/2017
<p>5.6.8 Forest managers, contractors, employees and forest owners shall be provided with sufficient information and encouraged to keep up-to-date through continuous training in relation to sustainable forest management as a precondition for all management planning and practices described in this standard.</p>	<p>Criterion 3.2: “The FME undertakes capacity building of its personnel for proper implementation of the management plan and research to augment the social, economic and environmental attributes of the forest area”.</p> <p>Indicator 3.2.1: “The FME shall establish mechanisms to communicate the management plan and its elements to the FME staff”.</p> <p>Indicator 3.2.2: “The FME shall ensure that the forest staff and workers are aware of their respective roles in implementation of the management plan, and are provided with appropriate training and capacity building to undertake the same as per documented mechanisms”.</p> <p>Indicator 3.2.3: “Wherever necessary, the FME shall use professional technicians to provide forest workers with necessary technical guidance for their field operations”.</p> <p>Indicator 3.2.4: “The FME shall maintain records of training provided to its staff in management plan implementation commensurate with their roles and responsibilities”.</p> <p>Indicator 3.2.5: “If the FME is engaging sub-contractors or outsourcing any portion of the work to outside agencies, the FME shall ensure that all such outsourcing agencies and subcontractors comply with the requirements of the management plan specific to their area of operations”.</p> <p>Criterion 9.2: “The FME identifies and provides opportunities for employment, training and other social services to the forest dwellers, tribals and local communities”.</p> <p>Criterion 10.4: “Appropriate to the scale and intensity of forest management operations, the FME undertakes training of forest workers for proper implementation of the management plan.</p> <p>Indicator 10.4.1: “The FME shall establish a documented training program for its workers for proper implementation of the management plan”.</p> <p>Indicator 10.4.2: “All the FME employees shall be trained in the proper implementation of the management plan. The FME maintains all records of these trainings”.</p> <p>Indicator 10.4.3: “The FME should ensure the use and access to adequate safety equipment by all the employees during the implementation of the forest management operations.</p>

	<p>Appropriate training of usage of such equipment and chemicals is provided to all including safety training/usage training”.</p> <p>Indicator 10.4.4: “The FME shall provide opportunities for employment and training to forest dependent communities, including tribals in the proper implementation of the management plan. The FME contributes to or directly develops training programs designed to enhance the capabilities and qualifications of local workers”.</p> <p>Indicator 10.4.5: “The FME shall identify, in consultation with workers’ representatives and local communities, opportunities for training and upskilling of workers to provide them opportunities for improving their economic well-being”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes comprehensive and detailed requirements for capacity building and training of the FME staff and workers (3.2, 10.4) on implementation of FMP (3.2, 10.4) as well as the health and safety (10.4.3). The Standard requires to establish a training programme and keep appropriate records (3.2.4, 10.4.2).</p> <p>The Standard also requires training for local communities (9.2, 10.4.4), including identification of needs for the training.</p> <p>Although the training does not explicitly refer to training of contractors, the Standard requires to ensure that the work is done according to the FMP (3.2.5).</p>	

PEFC ST 1003, 5.6.9	NCCF STD FM 1/2017
<p>5.6.9 Forest management practices shall make the best use of local forest-related experience and knowledge, such as those of local communities, forest owners, NGOs and local people.</p>	<p>Criterion 9.3: “Traditional knowledge of forest dwellers*(to be read in conjunction with local communities and tribals) regarding the use of forest species or traditional management systems is acknowledged and documented and any use of such knowledge in forest operations is fairly compensated. The compensation for the same shall be formally agreed upon with their free, prior and informed consent before the commencement of forest operations”.</p> <p>Indicator 9.3.1: “Any use of traditional knowledge of forest dwellers in forest operations w.r.t use of forest species, management systems or forest products and services shall be documented by the FME”.</p> <p>Indicator 9.3.2: “Appropriate mechanisms for providing a fair compensation for the commercial utilization of traditional forest-related knowledge and practices of forest dwellers in accordance with existing legislation or by agreement shall be established by the FME”.</p> <p>Indicator 9.3.3: “The norms and mechanisms for such compensation, as devised in indicator 9.3.2, shall be formally agreed upon with the free,</p>

	prior and informed consent of the forest dwellers before commencement of operations”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF TD FM 1/2017 includes detailed and comprehensive requirements for the usage of local forest-related experience (9.3), including mechanism for fair compensation (9.3.3).	

PEFC ST 1003, 5.6.10	NCCF STD FM 1/2017
5.6.10 Forest management shall provide for effective communication and consultation with local people and other stakeholders relating to sustainable forest management and shall provide appropriate mechanisms for resolving complaints and disputes relating to forest management between forest operators and local people.	<p>Indicator 2.3.1: “Conflicts over land tenure and rights shall be resolved in a systematic manner through appropriate mechanisms, with preference to voluntary and conciliatory methods over adjudication/arbitration or other legal mechanisms”.</p> <p>Indicator 2.3.2: “The FME shall record all such conflicts and their mode of resolution (along with outcomes), to avoid further litigation, as well as to set precedents for similar conflicts in future”.</p> <p>Indicator 2.3.3: “The magnitude and severity of unresolved tenure claims and rights disputes shall be minor, relative to the scale of forest management operations. For all such unresolved or outstanding disputes, the FME shall ensure that the circumstances and present status of the dispute and all steps/mechanisms engaged in dispute resolution are documented”.</p> <p>Criterion 9.1: The FME recognizes and respects the rights of forest dwellers, tribals and other forest dependent communities.</p> <p>Indicator 9.1.1: The FME shall identify and document the various forest dweller groups, tribals and local communities associated with the forest area in the scope of the certificate.</p> <p>Indicator 9.1.2: The FME shall assess and document the rights of forest dwellers, tribals and local communities in the forest area and respects and recognizes these rights.</p> <p>Indicator 9.1.3: The FME shall have a written commitment, signed by the top management of the FME, that it recognizes and respects the rights of forest dwellers, tribals and local communities.</p> <p>Indicator 9.1.4: “Any complaints or grievances related to infringement of rights of forest dwellers, tribals and local communities shall be recorded and addressed by the FME on a priority basis”.</p> <p>Indicator 9.4.3: “A stakeholder engagement process, based on Free, Prior Informed Consent shall be undertaken by the FME as part of the impact assessment process. The consultation process shall record and update the list of</p>



	<p>stakeholders, the consultation process and also documents the comments and concerns of the stakeholders”.</p> <p>Indicator 9.5.1: “The FME shall ensure that forest management operations (in forests vested with rights) do not threaten or diminish, either directly or indirectly, the resources and rights of the local communities, forest dwellers and tribals. Appropriate measures shall be taken to avoid the loss of or damage to the legal right, property, resources, or livelihood of local communities, tribals or other forest dwellers”.</p> <p>Indicator 9.5.2: “Where evidence exists that the resources and rights of local communities, forest dwellers and tribals has been violated by forest management operations, the FME shall undertake steps to resolve this violation, and document the steps followed”.</p> <p>Indicator 9.5.3: “The FME shall record all instances of damage to resources and rights, including any grievances/complaints in this regard, as well as the list of affected parties”.</p> <p>Indicator 9.5.4: “In cases of loss or damage to property, resources, livelihood or rights of local communities, tribals and forest dwellers, the issue shall be addressed through the provisions of legal recourse, as applicable”.</p> <p>Indicator 9.5.5: “In cases where compensation for such loss is not covered by legal frameworks, the FME shall undertake appropriate and documented procedures, mutually agreed upon through FPIC with the affected parties, for resolving these grievances and providing a fair, equitable outcome to these affected parties”.</p> <p>Indicator 9.5.6: “The FME shall have written procedures for calculating and providing a fair, equitable compensation for such damages, based on an assessment into the type, severity, scale and intensity of loss or negative impact as well as consultation with local communities, undertaken through an FPIC process.”</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes detailed and comprehensive requirements relating to local communities (including tribes and forest dwellers) that cover recognition of their customary and traditional rights (9.1); performing social impact assessment with the stakeholders' consultation following FPIC principles (9.4.3); resolution of any violation of their rights (including fair compensation); and requirements for resolution of complaints, conflicts and disputes (2.3, 9.14).</p>	

PEFC ST 1003, 5.6.11	NCCF STD FM 1/2017
<p>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.</p>	<p>Criterion 10.1: "FME meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families".</p> <p>Indicator 10.1.1: "The FME shall foster a safe working environment by:</p> <ul style="list-style-type: none"> <li>a. Complying with all relevant workplace health and safety laws;</li> <li>b. Facilitating improvements in workplace health and safety;</li> <li>c. Identifying associated health and safety risk and adopting working conditions that do not endanger health or safety</li> <li>d. Consulting with forest workers and their representatives on workplace health and safety".</li> </ul> <p>Indicator 10.1.2: The FME shall have written guidelines and policies, appropriate to the scale of operations for workplace health and safety and the same are publicly available.</p> <p>Indicator 10.1.3: The FME shall maintain up-to-date information on pertinent health and safety laws and regulations disseminates this information to forest workers.</p> <p>Indicator 10.1.4: The FME shall maintain up-to-date accident/workplace injury/safety records; These records are updated to reflect type and nature of accident, cause and palliative action undertaken.</p> <p>Indicator 10.1.5: Appropriate safety equipment shall be made available to all forest workers; forest workers use safety equipment appropriately and demonstrate proper management and harvest techniques.</p> <p>Indicator 10.1.6: The FME shall establish a grievance redressal mechanism for complaints related to poor or inadequate working conditions.</p> <p>Indicator 10.1.7: "The FME shall establish and implement, the relevant provisions of the Workman's Compensation Act, 1923, as the minimum requirement for compensation for any occupational injuries or workspace related injuries".</p> <p>Indicator 10.4.3: "The FME should ensure the use and access to adequate safety equipment by all the employees during the implementation of the forest management operations. Appropriate training of usage of such equipment and chemicals is provided to all including safety training/usage training".</p>

**Conclusion: Conformity**

**Justification:** NCCF TD FM 1/2017 includes comprehensive requirements relating to the OHS, including compliance with applicable laws (10.1, 10.1.a), identification of health and accident's risks (10.1.1c), safe working conditions and their improvement (10.1.1), consultation with workers, dissemination of information and training on OHS (10.1.1 d, 10.1.3, 10.4.3), OHS policies and guidelines (10.1.2), records keeping on OHS and injuries (10.1.4), safety equipment (10.1.5, 10.4.3), grievance mechanism for the OHS issues (10.1.6), and compensation in case of injuries (10.1.7).

PEFC ST 1003, 5.6.12	NCCF STD FM 1/2017
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.	<p>Criterion 10.1: "FME meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families".</p> <p>Indicator 10.1.1: "The FME shall foster a safe working environment by:</p> <ul style="list-style-type: none"> <li>a. Complying with all relevant workplace health and safety laws;</li> <li>b. Facilitating improvements in workplace health and safety;</li> <li>c. Adopting working conditions that do not endanger health or safety</li> <li>d. Consulting with forest workers and their representatives on workplace health and safety".</li> </ul> <p>Indicator 10.1.2: The FME shall have written guidelines and policies, appropriate to the scale of operations for workplace health and safety and the same are publicly available.</p> <p>Indicator 10.1.5: Appropriate safety equipment shall be made available to all forest workers; forest workers use safety equipment appropriately and demonstrate proper management and harvest techniques.</p> <p>Indicator 10.4.3: "The FME should ensure the use and access to adequate safety equipment by all the employees during the implementation of the forest management operations. Appropriate training of usage of such equipment and chemicals is provided to all including safety training/usage training".</p>
<b>Conclusion: Conformity</b> <p><b>Justification:</b> NCCF TD FM 1/2017 includes comprehensive requirements relating to the OHS, including compliance with applicable laws (10.1, 10.1.a), safe working conditions and their improvement (10.1.1), consultation with workers, dissemination of information and training on OHS (10.1.1 d, 10.1.3, 10.4.3), OHS policies and guidelines (10.1.2), safety equipment (10.1.5, 10.4.3).</p>	

PEFC ST 1003, 5.6.13	NCCF STD FM 1/2017
<p>5.6.13 Forest management shall comply with fundamental ILO conventions.</p>	<p>Criterion 10.2: “The FME respects and implements all applicable International Labour Organization (ILO) Conventions covered in the ILO’s Declaration of Fundamental Principles and Rights at Work (1998)”.</p> <p>Indicator 10.2.2: “The right of workers to benefits and protection as guaranteed under applicable laws and/or regulations shall be assured and provided for by the FME”.</p> <p>Indicator 10.2.3: “Documented procedures to address grievances/disputes raised by workers and/or their organizations and for conflict resolution shall be established by the FME”.</p> <p>Indicator 10.2.4: “The dispute resolution process shall recognize, at a minimum, the following types of conflict/dispute, and shall develop appropriate procedures (based on the scale, spread and complexity of the organization, nature of worker roles, and intensity of conflict) to address the same.</p> <ul style="list-style-type: none"> <li>a. Between workers and management</li> <li>b. Between workers or groups of workers and/or unions</li> <li>c. Between workers/management and external agencies”.</li> </ul> <p>Criterion 10.3: “Written guidelines are prepared, in accordance with relevant Indian labour laws, rules and regulations, for recruitment, promotion, dismissal, remuneration and benefits for permanent, temporary and contract workers. The FME does not negatively discriminate among employees on the basis on caste, religion, gender, age etc”.</p> <p>Indicator 10.3.1: “The FME shall have written guidelines, in accordance with relevant Indian labour laws, rules and regulations regarding recruitment, promotion, dismissal, remuneration and benefits for permanent, temporary and contract workers employed by the FME”.</p> <p>Indicator 10.3.2: “The FME shall communicate the working hours, wage rates, salaries and benefits to be provided to the workers and obtain written documentation regarding their acquiescence to the same before the engagement of workers in field duties. In cases where such rights are not legally covered, the FME shall identify and put in place provisions as per industry best practices”.</p>

	<p>Indicator 10.3.3: “The FME shall not discriminate among employees/workers based on caste, religion, gender, age, region etc”.</p> <p>Indicator 10.3.4: “The FME shall not permit the hiring or contracting of workers less than 14 years of age”.</p> <p>Indicator 10.3.5: “All workers shall be paid the legal minimum wage rates; which shall be derived as applicable from one of the following wage schedules, whichever is higher”:</p> <ol style="list-style-type: none"> <li>Minimum wages as designated by the Minimum Wages Act, 1948</li> <li>State specific Daily Minimum Wage Rates</li> <li>MGNREGA state specific daily wage rates</li> <li>Industry recognized wage agreements in consultation with workers’ representatives”.</li> </ol> <p>Indicator 10.3.6: “The FME shall appoint an officer of sufficient rank within its management, to independently investigate any complaints raised by workers related to violations of the provisions of this criterion”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>India has ratified 6 out of 8 fundamental ILO conventions (C029, C100, C105, C111, C138, C182)<sup>6</sup>. Two of the fundamental ILO conventions (C087 – Freedom of Association and Protection of the Right to Organise Convention, 1948) and C098 (Right to Organise and Collective Bargaining Convention, 1949) have not been ratified by India.</p> <p>NCCF TD FM 1/2017 bases its requirements on the compliance with the Fundamental ILO Conventions (8) that are stipulated in the ILO’s Declaration of Fundamental Principles and Rights at Work (1998) (10.2) and compliance with labour related legislation (10.2.2).</p> <p>In addition to the referenced ILO Conventions and national legislation, the Standard makes explicit requirements for (i) grievances and disputes in labour issues (10.2.3, 10.2.4, 10.3.6); written guidelines for the labour related issues (10.3.1), non-discrimination the basis on caste, religion, gender, age etc (10.3.3); communication on the labour issues (10.3.2); child labour – minimum 14 years (10.3.4); and minimum wage (10.3.5).</p>	

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[https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200\\_COUNTRY\\_ID:102691](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102691)

PEFC ST 1003, 5.6.14	NCCF STD FM 1/2017
<p>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.</p>	<p>Criterion 3.2: “The FME undertakes capacity building of its personnel for proper implementation of the management plan and research to augment the social, economic and environmental attributes of the forest area”.</p> <p>Criterion 4.1: “Appropriate to the scale and intensity of operations, forest management activities include the research and data collection to monitor the following attributes:”.</p> <p>Indicator 4.5.3: “The forest management operations shall contribute to or support research activities relevant for the sustainable management of forest resources”.</p> <p>Indicator 5.3.4: “The FME shall define the width of buffer zones to conserve water and soil at the banks of rivers and streams or around water bodies. These zones should be as per existing local guidelines, or, in their absence, based on available scientific data, keeping in mind precautionary principle”.</p> <p>Indicator 14.1.5: “The FME, in its practices, shall be guided by regionally based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, downed woody debris and nest trees”.</p> <p>Criterion 14.3: “The FME measures the biodiversity values of the forest area using scientifically based monitoring methodology developed in consultation with stakeholders and relevant experts, to determine if values are being maintained or enhanced within the defined forest area. Further, the FME shall assess the possible impact of forest management operations on biodiversity and adopt an appropriate management strategy to ensure that biodiversity losses do not occur, through utilization of the following hierarchy viz”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 requires to contribute to or support research activities relevant for the sustainable management of forest resources (4.5.3).</p> <p>In addition, it makes references to the research or a scientific approach concerning capacity building and training (3.2); monitoring of forest resources (4.1.1, 14.3), definition of the buffer zones (5.3.4), and wildlife habitat management (14.1.5).</p>	

PEFC ST 1003, 5.7.1	NCCF STD FM 1/2017
<p>5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes.</p>	<p>Criterion 1.1: “The Forest Management Enterprise (FME) identifies and records all national, state and local laws and administrative/regulatory requirements applicable to it and respects and complies with the provisions therein, in letter and spirit”.</p> <p>Indicator 1.1.1: “The FME and its managers shall have access to up-to-date copies of all applicable central, state and local laws, regulations and policies related to forest management and are aware and/or knowledgeable of the regulatory framework for forest management”.</p> <p>Indicator 1.1.2: “The FME shall comply with all laws applicable to forest management, including laws related to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land and resource rights for indigenous people and forest dependent communities; health, labour and safety issues; and payment of royalties and taxes”.</p> <p>Indicator 1.1.3: “The FME shall initiate suitable actions to resolve any case of non-compliance with these laws and regulations which are brought to its notice with the appropriate authorities. Records of all violations of these laws and the remedial, punitive or mediatory actions undertaken to address them are maintained by the FME”.</p> <p>Indicator 1.1.4: “When violations occur and are brought to notice of FME as per Indicator 1.1.3, the FME shall promptly to correct and remediate the circumstances associated with the violation with the appropriate authorities/legal mechanism”.</p> <p>Indicator 1.1.5: “The frequency and nature of regulatory violations, if indicative of widespread and systemic non-compliance, shall render the FME certificate liable for cancellation”.</p> <p>Criterion 1.2: “The FME ensures that all applicable and legally prescribed fees, royalties, taxes and other charges are paid regularly”.</p> <p>Criterion 1.3: “The FME, its managers and all participating FMUs (Forest Management Units) respect and implement the applicable provisions of all binding international agreements and conventions to which India is a signatory”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 requires compliance with all applicable national, state and local laws relating to forest management practices; nature and environmental protection; protected</p>	

and endangered species; property, tenure and land and resource rights for indigenous people and forest dependent communities; health, labour and safety issues; and payment of royalties and taxes (1.1, 1.1.2). The FME is required to have access to all the laws (1.1.1) and correct any apparent non-compliances (1.1.3, 1.1.4).

The standard also includes specific requirements to the payment of legally prescribed fees, royalties, taxes and other charges (1.2) and international agreements signed by India (1.3). r

PEFC ST 1003, 5.7.2	NCCF STD FM 1/2017
5.7.2 Forest management shall provide for adequate protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	<p>Criterion 1.4: "The FME ensures that forest areas are protected from illegal harvesting, hunting, settlement and other unauthorized activities and appropriate resources are provisioned for the same".</p> <p>Indicator 1.4.1: "The FME shall have a documented long term commitment for protection of the forest from unauthorized activities such as encroachments, illegal logging and land use, illegal mining, hunting, fires and other unauthorized activities".</p> <p>Indicator 1.4.2: "The FME should ensure that it has appropriate resources – infrastructure, financial and human, to ensure that illegal activities do not take place".</p> <p>Indicator 1.4.3: "If any illegal or unauthorized activities are detected, the FME and its officers shall take appropriate measures, in accordance with law, to address them".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF TD FM 1/2017 includes requirement for protection of forests against illegal activities of third parties (1.4), including documented commitment (1.4.1), appropriate resources (1.4.2) and resolution of any detected illegal or unauthorised activities.</p>	



## Annex D: Detailed assessment of requirements for forest management certification bodies

Annex 6 of the PEFC TD	NCCF STD ACB 1/2017
Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	<p>The NCCF is the sole standardisation body for the NCCF scheme governing and making decisions in the standard setting process.</p> <p>Chapter 5: “CB shall comply with the requirements of ISO/IEC 17065, ISO 19011 and be accredited with ISO/IEC 17065”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 and the scheme satisfies the requirement as:</p> <ul style="list-style-type: none"> <li>- ISO 17065 includes requirements for the certification body's impartiality.</li> <li>- No certification body can become a governing/decision making body for the NCCF scheme as this is a role of the NCCF.</li> </ul>	

Annex 6 of the PEFC TD	NCCF STD ACB 1/2017
Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	Chapter 5: “CB shall comply with the requirements of ISO/IEC 17065, ISO 19011 and be accredited with ISO/IEC 17065”.
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 satisfies the requirement.</p>	

Annex 6 of the PEFC TD	NCCF STD ACB 1/2017
Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	<p>“7.4.1 Requirements for FM Auditors</p> <p>7.4.1.1 Educational and professional experience:</p> <ul style="list-style-type: none"> <li>• Tertiary education (college or university qualification) in forestry.</li> <li>• Four (4) years of professional experience in the forest products sector</li> <li>• Successful completion of IRCA-registered or equivalent (e.g. QCI registered) “ISO management standard auditor course” ISO 9001:2015 and ISO 19011 course on auditing techniques.</li> <li>• Successful completion of auditor training of FM at NCCF.</li> <li>• Participation in audit <ul style="list-style-type: none"> <li>a. As observer in one evaluation audit</li> <li>b. As observer in one surveillance audits</li> </ul> </li> </ul>

	<p>c. As Auditor under supervision of CB's approved Lead Auditor</p> <p>d. For maintaining the qualification of auditor, the CB shall ensure that auditor participated in two (2) on site audits every year."</p> <p>"7.4.2 Audit Team: The audit team shall be comprised of by auditor(s) fulfilling the requirements. In some cases, technical experts may be required to support the required auditor competency in a particular technical area by providing appropriate technical expertise".</p> <p>"7.4.3 Further CB Staff: Further CB staff involved in the NCCF FM certification activities shall have at least basic knowledge of the NCCF system and competent as per their roles and responsibilities".</p> <p>"10.1.2.5 A forest management audit team shall include auditor(s) and/ or technical experts with the experience and qualifications to audit all aspects of the NCCF Principles and Criteria, taking account of the scale and complexity of the area to be assessed. Key considerations for the selection of auditors and technical experts for an audit shall include experience and qualifications in relation to relevant forest management, social, environmental and economic issues, as described in 7.4.1 of this document".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 defines requirements for auditors (7.4.1, 10.1.2.5) and other staff (7.4). Those elements provide sufficient confidence on the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria.</p>	

Annex 6 of the PEFC TD	NCCF STD ACB 1/2017
Does the scheme documentation require that certification bodies shall have a good understanding of the national PEFC system against which they carry out forest management or C-o-C certifications?	<p>"7.4.1 Requirements for FM Auditors</p> <p>7.4.1.1 Educational and professional experience:</p> <ul style="list-style-type: none"> <li>• Tertiary education (college or university qualification) in forestry.</li> <li>• Four (4) years of professional experience in the forest products sector</li> <li>• Successful completion of IRCA-registered or equivalent (e.g. QCI registered) "ISO management standard auditor course" ISO 9001:2015 and ISO 19011 course on auditing techniques.</li> <li>• Successful completion of auditor training of FM at NCCF.</li> <li>• Participation in audit</li> </ul> <p>a. As observer in one evaluation audit</p>

	<p>b. As observer in one surveillance audits</p> <p>c. As Auditor under supervision of CB's approved Lead Auditor</p> <p>d. For maintaining the qualification of auditor, the CB shall ensure that auditor participated in two (2) on site audits every year."</p> <p><b>"7.4.3 Further CB Staff:</b> Further CB staff involved in the NCCF FM certification activities shall have at least basic knowledge of the NCCF system and competent as per their roles and responsibilities".</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The NCCF training for auditors and "basic knowledge" for other staff of the certification satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 3.2	NCCF STD ACB 1/2017
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?	<p>"7.4.1 Requirements for FM Auditors</p> <p>7.4.1.1 Educational and professional experience:</p> <ul style="list-style-type: none"> <li>• Tertiary education (college or university qualification) in forestry.</li> <li>• Four (4) years of professional experience in the forest products sector</li> <li>• Successful completion of IRCA-registered or equivalent (e.g. QCI registered) "ISO management standard auditor course" ISO 9001:2015 and ISO 19011 course on auditing techniques.</li> <li>• Successful completion of auditor training of FM at NCCF.</li> <li>• Participation in audit</li> </ul> <p>a. As observer in one evaluation audit</p> <p>b. As observer in one surveillance audits</p> <p>c. As Auditor under supervision of CB's approved Lead Auditor</p> <p>d. For maintaining the qualification of auditor, the CB shall ensure that auditor participated in two (2) on site audits every year."</p> <p>10.1.2.5 "A forest management audit team shall include auditor(s) and/ or technical experts with the experience and qualifications to audit all aspects of the NCCF Principles and Criteria, taking account of the scale and complexity of the area to be assessed. Key considerations for the selection of auditors and technical experts for an audit shall include experience and qualifications in relation to relevant forest management, social, environmental and</p>

	economic issues, as described in 7.4.1 of this document”.
<b>Conclusion: Conformity</b> <b>Justification:</b> The required “IRCA-registered” or QCI course, ISO 9001 and ISO 19011 course, NCCF training of the forest management certification, and the forest management related knowledge as per 10.1.2.5 satisfies the requirement.	

Annex 6 of the PEFC TD, 3.2	NCCF STD ACB 1/2017
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?	Chapter 5: “CB shall comply with the requirements of ISO/IEC 17065, ISO 19011 and be accredited with ISO/IEC 17065”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD ACB 1/2017 requires the certification body to comply with ISO 19011. This covers both the competencies of auditors as well as the auditing process.	

Annex 6 of the PEFC TD, 3.2	NCCF STD ACB 1/2017
Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits?	Chapter 7.4 and chapter 10 defines requirements for auditors and audit team, such as education, training, minimum auditing experience, language skills, etc.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD ACB 1/2017 includes additional requirements for auditors’ qualification Note: It should be noted that the PEFC requirement is introduced with wording “should” and is therefore not considered as a mandatory requirement.	

Annex 6 of the PEFC TD, 3.2	NCCF STD ACB 1/2017, 8.1.2
Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	<p>"The management system of the certification body shall address the following:</p> <ul style="list-style-type: none"> <li>• general management system documentation (e.g. manual, policies, definition of responsibilities) (see 8.2);</li> <li>• control of documents (see 8.3);</li> <li>• control of records (see 8.4);</li> <li>• management review (see 8.5);</li> <li>• internal audit (see 8.6);</li> <li>• corrective actions (see 8.7);</li> <li>• preventive actions (see 8.8).</li> </ul>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017, chapter 8 requires the certification body to establish a management system. Chapter 8.1.2, first bullet point requires the management system to be documented.</p>	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017
Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Chapter 5: "CB shall comply with the requirements of ISO/IEC 17065, ISO 19011 and be accredited with ISO/IEC 17065".
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017
Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Chapter 5: "CB shall comply with the requirements of ISO/IEC 17065, ISO 19011 and be accredited with ISO/IEC 17065".
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 requires the certification body to comply with ISO 19011. This covers both the competencies of auditors as well as the auditing process.</p>	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017
<p>Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management and chain of custody certificates and changes concerning the validity and scope of these certificates?</p>	<p>Chapter 10.1.5.1</p> <p>“The CB shall inform the NCCF about upcoming scheduled Evaluation, Re-Evaluation and Surveillance audits of Forest Management before 1 month of main evaluation. NCCF will make this information publicly available via NCCF website”.</p> <p>“The CB shall inform and provide the information about certificate issued to NCCF within 7 working days from the date of issuance of the certificate”.</p> <p>Chapter 10.3.1</p> <p>“The CB shall advise the NCCF in writing, within 2 business days if certification is suspended or withdrawn, or where there are any changes in decisions relating to the status of certification of an organization, and the reasons for those decisions. When a nonconformity with certification requirements is substantiated, either as a result of surveillance or otherwise, the CB shall consider and decide upon the appropriate action”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 requires the certification body to inform the NCCF about the scheduled audits (10.1.5.1), issued certificates (10.1.5.1) and about changes in the certificate validity (10.3.1).</p>	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017, 10.1.6
<p>Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?</p>	<p>“The stage 1 audit has the function of a “Readiness Review for the main evaluation”. The scope of this audit comprises: ...</p> <p>vi. determine the conformity of the client organisation with the PEFC/NCCF logo usage rules and its effective implementation”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 satisfies the requirement.</p>	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017, 10.2.1. e
Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	“Surveillance audits shall be conducted at least once a year. The date of the first surveillance audit following initial certification shall not be more than 12 months from the last day of the stage 2 audit. 3 months extension can be given to the client for completing annual audit after justification and CB shall document it”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD ACB 1/2017 satisfies the requirement.	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017, 10.2.1. b
Does a maximum period for assessment audit not exceed five years for forest management certifications?	“For a certificate having 5 years duration, at least four surveillance evaluations shall take place before the certificate expires”.
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD ACB 1/2017 satisfies the requirement.	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017, 10.1.5.1
Does the scheme documentation include requirements for public availability of certification report summaries?	<p>“The CB shall make a summary of FM Audit Report which shall be made publicly available by NCCF within 90 days from the date of audit. Confidential data can be excluded. The summary shall include at least the following:</p> <ul style="list-style-type: none"> <li>• Information about the certificate holder</li> <li>• Name and contact information, Scope of Certificate (area details, Certificate type, management units), Group members, Production Forest details, Conservation areas details, etc.</li> <li>• Audit scope and objectives</li> <li>• Audit plan (dates and locations, activities, etc.)</li> <li>• Audit team (Name, Qualification and brief experience)</li> <li>• Audit results (weaknesses and strengths found, corrective action requests)</li> <li>• Stakeholder comments (if any)</li> <li>• Use of pesticides and other chemicals used; Certificate Decision”.</li> </ul>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD ACB 1/2017 includes the requirement for public availability of the certification report summary and requires the NCCF to publish it within 90 days.	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017, 10.1.7
Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	<ul style="list-style-type: none"> <li>• “The CB shall inform NCCF at least 45days prior to the onsite visit of main-evaluation. The NCCF shall release a 30 days stakeholder announcement via NCCF Website which states the client’s intention to pursue the NCCF Certification. The stakeholder announcement shall invite stakeholders to meet with audit team, or to submit written submission if preferred.</li> <li>• Stakeholders comments/response pertaining to the client’s operations and certification shall be addressed by the CB as a part of main evaluation report.</li> <li>• For stakeholder announcement, the CB shall provide the following information to NCCF:               <ol style="list-style-type: none"> <li>a. Name of client;</li> <li>b. Name and Contact Details of CB;</li> <li>c. Name and address of sites to be audited;</li> <li>d. Description of evaluation are;</li> <li>e. Type of forest Area;</li> <li>f. HCV area (if declared/disclosed)</li> <li>g. A brief outline of the process that stakeholders should follow to meet the audit team or submission of comments.</li> </ol> </li> </ul>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 includes requirements for stakeholders’ consultation to be carried out as a part of the certification process.</p>	

Annex 6 of the PEFC TD, 4	NCCF STD ACB 1/2017
Does the scheme documentation include additional requirements for certification procedures?	The document (chapter 10) includes scheme specific requirements for certification process.
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 includes additional requirements for certification process.</p> <p>Note: It should be noted that the PEFC requirement is introduced with wording “should” and is therefore not considered as a mandatory requirement.</p>	



Annex 6 of the PEFC TD, 5	NCCF STD ACB 1/2017, Annex 1
<p>Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?</p>	<p>3 Terms and Definitions</p> <p>“Accreditation Body: An accreditation body is an organization delegated to make decisions, about the status, legitimacy or appropriateness of a CB. In case of NCCF FM certification, an accreditation body should be signatory of the IAF Multilateral Recognition Arrangement (MLA)”.</p> <p>Chapter 4: “The National Accreditation Board for Certification Bodies (NABCB): NABCB provides accreditation to Certification Bodies based on assessment of their competence as per the Board's criteria and in accordance with NCCF Standards and Guidelines contained here with”.</p> <p>Chapter 5: “CB shall be accredited by an accreditation body that is signatory of the IAF Multilateral Recognition Arrangement (MLA) for product certification”.</p> <p>Annex 1: “NCCF requires that forest management certification shall be carried out by certification bodies who are accredited by National Accreditation Board for Certification Bodies (NABCB) (a member signatory of the IAF Multilateral Recognition Arrangement (MLA) for product certification). The scope of the accreditation shall explicitly cover the NCCF FM standard in its valid version and/or with reference to any future changes and amendments adopted by the NCCF and presented at the NCCF official website (<a href="http://www.nccf.in">www.nccf.in</a>). The scope of accreditation shall also explicitly state ISO/IEC 17065, this document and other requirements against which the certification body has been assessed”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017 requires that the certification body shall be accredited by an accreditation body that is a signatory to the IAF multilateral agreement for product certification (Chapter 5). In chapter 4 and especially Annex, the document is more specific as it outlines that the accreditation shall be provided by the Indian national accreditation body (NABCB). The accreditation shall be issued against ISO 17065 and shall cover the FM standard in its scope.</p>	

Annex 6 of the PEFC TD, 5	NCCF STD ACB 1/2017
Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 1: "The F M certificates issued by the NABCB accredited Certification Body (and its affiliates) shall bear the (NABCB) accreditation body logo/symbol".
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD ACB 1/2017, Annex 1 requires that the certificates shall bear an accreditation body's symbol. This ensures that the certificate is issued within the scope of the valid accreditation and is considered as the "accredited certificate".	

Annex 6 of the PEFC TD, 5	NCCF STD ACB 1/2017
Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF's special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	<p>"Chapter 4: "The National Accreditation Board for Certification Bodies (NABCB): NABCB provides accreditation to Certification Bodies based on assessment of their competence as per the Board's criteria and in accordance with NCCF Standards and Guidelines contained here with".</p> <p>Chapter 5: "CB shall be accredited by an accreditation body that is signatory of the IAF Multilateral Recognition Arrangement (MLA) for product certification".</p> <p>Annex 1: "NCCF requires that forest management certification shall be carried out by certification bodies who are accredited by National Accreditation Board for Certification Bodies (NABCB) (a member signatory of the IAF Multilateral Recognition Arrangement (MLA) for product certification). The scope of the accreditation shall explicitly cover the NCCF FM standard in its valid version and/or with reference to any future changes and amendments adopted by the NCCF and presented at the NCCF official website (<a href="http://www.nccf.in">www.nccf.in</a>). The scope of accreditation shall also explicitly state ISO/IEC 17065, this document and other requirements against which the certification body has been assessed".</p>
<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD ACB 1/2017 satisfies the requirement as: <ul style="list-style-type: none"> <li>- The IAF multilateral agreement requires membership in the IAF and compliance with ISO 17011,</li> <li>- NABCB is a member of the IAF and is a signatory to the IAF multilateral agreement for product certification (ISO 17065). For more info see <a href="http://www.iaf.nu">www.iaf.nu</a>.</li> </ul>	

Annex 6 of the PEFC TD, 5	NCCF STD ACB 1/2017
<p>Does the scheme documentation require that certification body undertake forest management as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?</p>	<p>Annex 1: “NCCF requires that forest management certification shall be carried out by certification bodies who are accredited by National Accreditation Board for Certification Bodies (NABCB) (a member signatory of the IAF Multilateral Recognition Arrangement (MLA) for product certification). The scope of the accreditation shall explicitly cover the NCCF FM standard in its valid version and/or with reference to any future changes and amendments adopted by the NCCF and presented at the NCCF official website (<a href="http://www.nccf.in">www.nccf.in</a>). The scope of accreditation shall also explicitly state ISO/IEC 17065, this document and other requirements against which the certification body has been assessed”.</p> <p>Annex 1: “The FM certificates issued by the NABCB accredited Certification Body (and its affiliates) shall bear the (NABCB) accreditation body logo/symbol”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017, Annex 1 requires that the certificates shall bear an accreditation body’s symbol. This ensures that the certificate is issued within the scope of the valid accreditation and is considered as the “accredited certificate” as:</p> <ul style="list-style-type: none"> <li>- The certification body is required to have the NCCF forest management standard in the accreditation scope;</li> <li>- ISO 17011 (that is required to be followed by all IAF MLA signatories) requires (8.3.1) that the certification body can only use the accreditation symbol on certificates issued within the scope of its accreditation, i.e. “the accredited certificate”.</li> </ul>	

Annex 6 of the PEFC TD, 5	NCCF STD ACB 1/2017
<p>Does the scheme documentation include a mechanism for PEFC notification of certification bodies?</p>	<p>NCCF STD ACB 1/2017, Annex 2</p> <p>“For performing the certifications against NCCF FM certifications, the Certification Bodies shall be notified by the NCCF and its certificates, recognised by the NCCF (refer NCCF procedures notification to certification bodies)”.</p> <p>NCCF STD ACB 1/2017, Annex 2</p> <p>“In order to ensure the independence of certification bodies, the NCCF notification conditions decided by the NCCF shall only cover:</p> <ol style="list-style-type: none"> <li>administrative conditions (e.g. communication of the CB with the NCCF Council, transfer of information, etc.);</li> </ol>

	<p>b. financial conditions (fees imposed on certified entities),</p> <p>c. compliance with requirements for certification bodies verified through accreditation as described in this standard”.</p> <p>The NCCF notification conditions shall not discriminate against certification bodies or create trade obstacles.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017, Annex 2 requires the certification bodies to be notified by the NCCF and defines conditions for the notification.</p>	

Annex 6 of the PEFC TD, 5	NCCF STD ACB 1/2017, NCCF STD NCB 1/2017
Are the procedures for the notification of certification bodies non-discriminatory?	<p>NCCF STD ACB 1/2017, Annex 2</p> <p>“In order to ensure the independence of certification bodies, the NCCF notification conditions decided by the NCCF shall only cover:</p> <p>d. administrative conditions (e.g. communication of the CB with the NCCF Council, transfer of information, etc.);</p> <p>e. financial conditions (fees imposed on certified entities),</p> <p>f. compliance with requirements for certification bodies verified through accreditation as described in this standard”.</p> <p>“The NCCF notification conditions shall not discriminate against certification bodies or create trade obstacles”.</p>
<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD ACB 1/2017, Annex 2 prohibits discrimination within the notification. NCCF STD NCB 1/2017 does not include any requirement that could be used to discriminate a certification body.</p>	

## Annex E: Evaluation of standard setting procedures against PEFC ST 1001:2017

PEFC ST 1001:2017, 5.1.1		
5.1.1 The standardising body shall have written procedures for standard-setting activities describing:		
a) its legal status and organizational structure, including a body responsible for consensus-building (working group, refer to 6.4) and procedures for formal adoption of the standard (refer to 7.1)	Procedures	<p>Article 4 of NCCF STD SSP 01/2015 states that the NCCF is the standardisation body that supports and coordinates the development of the certification standards.</p> <p><b>Formal adoption of the standard:</b></p> <p>NCCF STD SSP 01/2015, chapter 5.11 states that the Governing Body of the NCCF is responsible for the formal approval of standards and technical documents.</p> <p>The composition and decision making of the NCCF's Governing Body is defines in the Rules and Regulations of the NCCF.</p> <p><b>Body responsible for consensus building</b></p> <p>NCCF STD SSP 01/2015, chapter 4.6 and 5.8 define the Standard Development Group (SDG) as the body consisting of stakeholders that is responsible for consensus building.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 defines both, a body for the consensus building as well as the body for the formal approval of standards.</p>
b) procedures for keeping documented information	Procedures	<p>NCCF STD SSP 01/2015, chapter 4.4 and Annex B define rules for keeping records as well as scope and public availability of the records.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 requires the keeping of records relating to the standard setting process.</p>
c) the procedures for balanced representation of stakeholders,	Procedures	<p>NCCF STD SSP 01/2015, chapter 4.5, define composition of the SDG, chapters 5.8 and 5.9 define consensus building mechanism within the SDG.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 includes procedures for balanced representation of stakeholders.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p>

d) the standard-setting process,	Procedures	<p>NCCF STD SSP 01/2015, chapter 5 includes procedures for the standard setting/revision process.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 includes procedures for the standard-setting process.</p>
e) the mechanism for reaching consensus, and	Procedures	<p>NCCF STD SSP 01/2015, chapter 5.8 and 5.9 include procedures for consensus building within the SDG.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 includes procedures for reaching consensus.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p>
f) review and revision of standard(s)/normative document(s)	Procedures	<p>NCCF STD SSP 01/2015, chapter 6 includes procedures for the revision of standards.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015, chapter 6 defines procedures for the revision of standards.</p> <p>It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not.</p>

**PEFC ST 1001:2017, 5.1.2**

5.1.2 The standardizing body shall make its standard-setting procedures publicly available and shall review its standard-setting procedures regularly. The review shall consider feedback from stakeholders.

Procedures	<p>NCCF STD SSP 01/2015, chapter 4.3 requires that “The NCCF shall make its standard-setting procedures publicly available”.</p> <p>Annex B of NCCF STD SSP 01/2015 requires that “All the documents that are required to be available publicly will be made available on the website of NCCF and upon request”.</p> <p>NCCF STD SSP 01/2015, chapter 6.3 states that “NCCF to ensure that the Requirements for Standard Setting Process NCCF -STD-SSP- 01 /2015 shall be revised in a timely manner prior to the initiation of the revision of the management standards or at interval that do not exceed a five-year period and as and when required”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement. The document Concerning the regular review of the standard setting procedures it is assumed that outlines that the standard setting procedures shall be reviewed prior to each revision.</p>
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**PEFC ST 1001:2017, 5.2.1**

5.2.1 The standardizing body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardizing body's own procedures includes: a) Standard-setting procedures, b) Stakeholder identification mapping, c) Contacted and/or invited stakeholders, d) Stakeholders involved in standard-setting activities including participants in each working group meeting, e) Feedback received and a synopsis of how feedback was addressed, f) All drafts and final versions of the standard, g) Outcomes from working group considerations, h) Evidence of consensus on the final version of the standard(s), i) Evidence relating to the review process, and j) Final approval by the standardizing body.

**Procedures**

NCCF STD SSP 01/2015, chapter 4.4 requires that "The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request".

Annex B to NCCF STD SSP 01/2015 requires that "All the documents that are required to be available publicly will be made available on the website of NCCF and upon request".

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 includes a general requirement for keeping records. However, it does not define detail of records to be kept would satisfy bullet points a-j of PEFC ST 1001.

**PEFC ST 1001:2017, 5.2.2**

5.2.2 Documented information shall be kept until completion of the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of five years after publication of the standard.

**Procedures**

NCCF STD SSP 01/2015, chapter 4.4 requires that "The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request".

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 requires that the records shall be kept for a minimum of five year that corresponds with the NCCF's revision cycle.

The minor non-conformity has been assigned based on the fact that the records keeping period is not defined as starting by the standard's publication.

PEFC ST 1001:2017, 5.2.3	
5.2.3 Documented information shall be available to interested parties upon request.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.4 requires that “The NCCF shall keep records relating to the standard-setting process, providing evidence of compliance with the requirements of this document as well as its own procedures. The records shall be kept for a minimum of five years and shall be available to interested parties upon request”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 requires public availability of the records.</p>

PEFC ST 1001:2017, 5.3.1	
5.3.1 The standardizing body shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard-setting activities. It must make procedure(s) accessible to stakeholders.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p>The NCCF documentation is available at the NCCF’s website</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 and NCCF DRP: 01/2017 include procedures for complaints resolution.</p>

PEFC ST 1001:2017, 5.3.1	
5.3.1a [Upon receipt of the complaint, the standard-setting body shall]: a) acknowledge receipt of the complaint to the complainant,	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p>NCCF DRP 01/2017, chapter 7.6 states that: “The ED shall acknowledge receipt of all disputes in writing after receiving the complaint and forward the same to the DRC”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The referenced documents satisfy the requirement.</p>
5.3.1b [Upon receipt of the complaint, the standard-setting body shall]: b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal, and	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p>NCCF DRP 01/2017, chapter 7 includes procedures for investigation of the complaints by the Dispute Resolution Committee ensuring its impartiality.</p>



	<b>Conclusion: Conformity</b> <b>Justification:</b> The referenced documents satisfy the requirement.
5.3.1c [Upon receipt of the complaint, the standard-setting body shall]: c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 4.6 includes an explicit reference to procedures for resolution of complaints described in NCCF DRP 01/2017.</p> <p>NCCF DRP 01/2017, chapter 7.10: "The investigating authority shall record its decision which will be communicated by the NCCF secretariat to the complainant".</p> <p><b>Compliance: Minor non-conformity</b></p> <p><b>Justification:</b> The referenced documents do not require to communicate to the complainant the "handling process".</p>

**PEFC ST 1001:2017, 5.3.2**

5.3.2 The standardizing body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.

Procedures	<p>NCCF STD SSP 01/2015, chapter 4.7 states that "at least one contact point/person for enquiries and complaints relating to its standard-setting activities shall be established by NCCF".</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The referenced document satisfies the requirement.</p>
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**PEFC ST 1001:2017, 6.1.1**

6.1.1 For the creation of a new standard, the standardizing body shall develop a proposal including: a) the scope of the standard, b) justification of the need for the standard, c) a clear description of the intended outcomes, d) a risk assessment of potential negative impacts arising from implementing the standard, such as; • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, and e) a description of the stages of standard development and their expected timetable.

Procedures	<p><b>Compliance: Minor non-conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements relating to a "proposal".</p>
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**PEFC ST 1001:2017, 6.1.2**

6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.

Procedures	<p><b>Compliance: Minor non-conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements relating to a "proposal".</p>
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**PEFC ST 1001, 6.2.1**

6.2.1 The standardizing body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the standardizing body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.

**Procedures**

NCCF STD SSP 01/2015, chapter 5.1 states that: "The NCCF shall identify stakeholders relevant to the objectives and scope of the standard-setting work. In the case of forest management certification, all the relevant stakeholder groups shall represent the different aspects of sustainable forest management at national or sub-national/ regional level covering the social, economic, environmental interest groups and the relevant institutions and government agencies"

*Note: A stakeholder mapping exercise that includes defining which interest sectors are relevant and why, and for each sector what are likely to be the key issues, who are the key stakeholders, and what means of communication will best reach them, is a recognized means of meeting the requirement.*

**Compliance: Conformity**

**Justification:** The document satisfies the requirement.

**PEFC ST 1001:2017, 6.2.2**

6.2.2 Identification of stakeholder groups shall be based on nine major stakeholder groups as defined by Agenda 21 of the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the stakeholder mapping: • forest owners, • business and industry, • indigenous people, • non-government organizations, • scientific and technological community, • workers and trade unions.

Other groups shall be added if relevant to the scope of standard-setting activities

**Procedures**

NCCF STD SSP 01/2015, chapter 5.1 states that: "The NCCF shall identify stakeholders relevant to the objectives and scope of the standard-setting work. In the case of forest management certification, all the relevant stakeholder groups shall represent the different aspects of sustainable forest management at national or sub-national/ regional level covering the social, economic, environmental interest groups and the relevant institutions and government agencies".

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/20 does not provide an explicit list of stakeholder groups that shall be covered by the stakeholder mapping.

**PEFC ST 1001:2017, 6.2.3**

6.2.3 The standardizing body shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities

**Procedures**

NCCF STD SSP 01/2015, chapter 5.2 states that: "The NCCF shall identify and classify disadvantaged and key stakeholders, their balanced representation. It shall also address the constraints of their involvement and proactively seek their participation and contribution in the standard-setting activities".

**Compliance: Conformity**

	<b>Justification:</b> NCCF STD SSP 01/20 satisfies the requirement concerning the key stakeholders.
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**PEFC ST 1001:2017, 6.3.1**

6.3.1 The standardizing body shall make a public announcement of the start of the standard-setting process and include an invitation to stakeholders to participate in the process. The announcement shall be made in a timely manner through suitable media, as appropriate, to give stakeholders an opportunity for meaningful contributions.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The NCCF shall make a public announcement for the commencement of the standard-setting process. NCCF shall also provide an opportunity to stakeholders by sending them invitation for their participation in the standard setting process, in a time bound manner on the website and in suitable media. The announcement and invitation made for stakeholders shall include..."</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the PEFC requirements as it requires (i) the public announcement, (ii) made in suitable media and (iii) in timely manner.</p>
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**PEFC ST 1001, 6.3.1a**

6.3.1a [The announcement and invitation shall include:] a) overview of the standard-setting process

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (a) Objectives, scope and the steps of the standard-setting process and its probable timelines".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
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6.3.1b [The announcement and invitation shall include:] b) access to the proposal for the standard (refer to 6.1)

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (a) Objectives, scope and the steps of the standard-setting process and its probable timelines".</p> <p><b>Conclusion: Minor non-conformity</b></p> <p><b>Justification:</b> Although the "proposal primarily includes information about the objectives, scope and timetable of the process, NCCF STD SSP 01/2015 does not use the concept of the "proposal" and does not require to make a reference to it in the public announcement.</p>
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6.3.1 c [The announcement and invitation shall include:] b) information about opportunities for stakeholders to participate in the process

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (b) opportunities for stakeholders to participate in the process</p> <p><b>Conclusion: Conformity</b></p>
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	<b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.
6.3.1d [The announcement and invitation shall include:] d) requests to stakeholders to nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (c) an invitation to stakeholders to nominate their representative. 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".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
6.3.1e [The announcement and invitation shall include:] e) explicit invitation and clear instruction on how to submit feedback on the scope and standard setting process, and	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (d) an invitation to comment on the scope and the standard-setting process".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
6.3.1f [The announcement and invitation shall include:] e) access to the standard-setting procedures.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.3 states that: "The announcement and invitation made for stakeholders shall include: (d) reference to publicly available standard-setting procedures".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>

**PEFC ST 1001:2017, 6.3.2**

6.3.2 The standardizing body shall review the standard-setting process based on feedback received in response to the public announcement.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.4 states that: "The NCCF shall review the standard-setting process based on comments received from the public announcement...".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
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**PEFC ST 1001:2017, 6.4.1**

6.4.1 The standardizing body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for balanced representation of the working group, considerations of an appropriate gender balance, relevance of the organization, an individual's competence, an individual's relevant experience and resources available for standard-setting.

**Procedures**

NCCF STD SSP 01/2015, chapter 4.5 includes procedures for establishment of the Standard Development Group (SDG) that is responsible for the development of the NCCF standard(s). The SDG can establish a Technical Working Group (TWG) to facilitate its working, for technical, regional or thematic requirements.

NCCF STD SSP 01/2015, chapter 5.4 states that: "The NCCF shall review the standard-setting process based on comments received from the public announcement and establish a standard development group or adjust the composition of an already existing standard development group, based on received nominations. The acceptance and refusal of nominations shall be justifiable in relation to the requirements for balanced representation of the standard development group and resources available for the standard-setting".

**Compliance: Conformity**

**Justification:** NCCF STD SSP 01/2015 satisfies the requirement.

**PEFC ST 1001, 6.4.2a**

6.4.2a The working group shall: a) have balanced representation and decision-making by stakeholder categories, relevant to the subject matter and geographical scope of the standard, where no single concerned stakeholder group can dominate, nor be dominated in the process.

**Procedures**

NCCF STD SSP 01/2015, chapter 4.5 states that the SDG shall:

"Have balanced representation and decision-making by stakeholder categories. NCCF should take reference from the categories mentioned in the UN Agenda 21, relevant to the subject matter for balanced representation of stakeholders within the SDG in sectors of environment, economic, social (workers' trade union, communities in and around forests, forest dwellers, tribals), certification bodies, forestry institutions, accreditation bodies and relevant government agencies where single concerned interests should not dominate nor be dominated in the process".

NCCF STD SSP 01/2015, chapter 5.8 and 5.9 include provisions for building consensus within the SDG and resolution of members objections.

**Conclusion: Conformity**

**Justification:** The document satisfies the requirement.

**PEFC ST 1001:2017, 6.4.2 b**

6.4.2b The working group shall: include stakeholders with expertise relevant to the subject matter of the standard, those that are affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants.

## Procedures

NCCF STD SSP 01/2015, chapter 4.4 states that the SDG shall:

“Include stakeholders with expertise relevant to the subject matter of the standard, those that are materially affected by the standard, and those that can influence the implementation of the standard. The materially affected stakeholders shall represent a meaningful segment of the participants”.

**Compliance: Conformity**

**Justification:** The document satisfies the requirement.

**PEFC ST 1001:2017, 6.4.3**

6.4.3 In order to achieve balanced representation, the standardizing body shall strive to have all identified stakeholder groups (refer to 6.2) represented. The standardizing body shall set targets for the participation of key stakeholders and proactively seek their participation by using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.

## Procedures

NCCF STD SSP 01/2015, chapter 5.2 states:

“The NCCF shall identify and classify disadvantaged and key stakeholders, their balanced representation. It shall also address the constraints of their involvement and proactively seek their participation and contribution in the standard-setting activities”.

**Compliance: Minor non-conformity**

**Justification:** The document meets the objective of the requirement to ensure balanced representation of stakeholders. However, it is not explicit enough concerning the targets for stakeholders’ representation. Also, chapter 5.2. is not explicitly referring to the composition of the “working group”.

**PEFC ST 1001:2017, 6.4.4**

6.4.4a Activities of the working group shall be organized in an open and transparent manner where:  
a) working drafts shall be available to all members of the working group.

## Procedures

NCCF STD SSP 01/2015, chapter 5.5 states that “The work of the standard development group shall be organized in an open and transparent manner where:  
(a) Working drafts shall be made available to all members of the Standard development group”.

**Conclusion: Conformity**

**Justification:** NCCF STD SSP 01/2015 satisfies the requirement.

6.4.4b Activities of the working group shall be organized in an open and transparent manner where: b) All members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.5 states that “The work of the standard development group shall be organized in an open and transparent manner where: (b) All members of the standard development group shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>

6.4.4c Activities of the working group shall be organized in an open and transparent manner where: c) feedback and views given by any member of the working group shall be considered in an open and transparent way where the outcome of these considerations is recorded.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.5 states that “The work of the standard development group shall be organized in an open and transparent manner where: (c) Comments and views submitted by any member of the standard development group shall be considered in an open and transparent way and their resolution and proposed changes shall be recorded”.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>

<b>PEFC ST 1001:2017, 6.4.5</b>	
<p>6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of a consensus. In order to determine whether there is any sustained opposition, the working group can utilize the following methods:</p> <p>a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,</p> <p>b) telephone conference meeting(s) where there is a verbal yes/no vote,</p> <p>c) e-mail request to the working group for agreement or objection where the members provide a formal (written) response (vote), or</p> <p>d) combinations of these methods.</p>	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.8 states that “The decision of the Standard Development Group to recommend the final draft for formal approval to the NCCF Governing Body shall be taken on the basis of a consensus. In case of any opposition the following processes can be used by the standard development group to reach an accord:</p> <p>(e) a face-to-face meeting where there is a verbal yes/no vote, or show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process, etc.,</p> <p>(f) a telephone conference meeting where there is a verbal yes/no vote,</p> <p>(g) an email meeting where a request for agreement or objection is provided to members with the members providing a written response (a proxy for a vote),</p>

	<p>(h) or combinations thereof".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
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**PEFC ST 1001:2017, 6.4.6**

6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.8 allows voting. However, the document does not determine any threshold for the decision making.</p> <p><b>Conclusion: Minor non-conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 does not determine the decision-making threshold.</p>
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**PEFC ST 1001:2017, 6.4.7**

6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:

- a) finding a compromise through discussion and negotiation on the disputed issue within the working group,
- b) finding a compromise through direct negotiation between the stakeholder(s) making the objection and other stakeholders with different views on the disputed issue,
- c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardizing body determines the scope and duration of any additional public consultation.

Procedures	<p>NCCF STD SSP 01/2015, chapter 5.9 states that:</p> <p>"In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):</p> <ul style="list-style-type: none"> <li>(d) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,</li> <li>(e) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,</li> <li>(f) dispute resolution process".</li> </ul> <p><b>Compliance: Minor non-conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 does not define additional public consultation as the mechanism to resolve the sustained opposition.</p>
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**PEFC ST 1001:2017, 6.4.8**

6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardizing body shall initiate dispute resolution in accordance with its procedures for impartial and objective action.

**Procedures**

NCCF STD SSP 01/2015, chapter 5.9 states that:

“In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s):

- a) discussion and negotiation on the disputed issue within the working group/committee in order to find a compromise,
- b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise,
- c) dispute resolution process”.

**Compliance: Conformity**

**Justification:** NCCF STD SSP 01/2015 defines the dispute settlement as the mechanism to resolve the sustained opposition.

**PEFC ST 1001:2017, 6.5.1**

6.5.1a The standardizing body shall organize public consultation on the enquiry draft and shall ensure that: a) the start and the end dates of public consultation are announced in a timely manner through suitable media.

Note: In a timely manner means (at the latest) the day before the start of public consultation

**Procedures**

NCCF STD SSP 01/2015, chapter 5.6 states that “[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (a) The start and the end of the public consultation is announced in a timely manner in suitable media”.

**Conclusion: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 does not define the term “timely manner”.

6.5.1b The standardising body shall organise a public consultation on the enquiry draft and shall ensure that: b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups.

**Procedures**

NCCF STD SSP 01/2015, chapter 5.6 states that “[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable”.

**Conclusion: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 requires the direct invitation to disadvantaged and key stakeholders while the PEFC requirement refers to all stakeholders identified in the stakeholder mapping.

6.5.1c The standardising body shall organise a public consultation on the enquiry draft and shall ensure that: c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (b) the invitation of disadvantaged and key stakeholders shall be made by means that ensure that the information reaches its recipient and is understandable".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
6.5.1d The standardising body shall organise a public consultation on the enquiry draft and shall ensure that d) the enquiry draft is made publicly available.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (c) the enquiry draft is publicly available and accessible".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
6.5.1e The standardising body shall organise a public consultation on the enquiry draft and shall ensure that e) public consultation is for at least 60 days	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (d) the public consultation is for at least 60 days".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
6.5.1f The standardising body shall organise a public consultation on the enquiry draft and shall ensure that f) all feedback received are considered by the working group in an objective manner.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard and shall ensure that]: (e) all comments received are considered by the working group/committee in an objective manner".</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.</p>
6.5.1g The standardising body shall organise a public consultation on the enquiry draft and shall ensure that g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.6 states that "[The NCCF shall organize a public consultation on the Draft Standard 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".</p> <p><b>Conclusion: Minor non-conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 does not require that the synopsis is sent to stakeholder that gave feedback.</p>

PEFC ST 1001:2017, 6.5.2	
6.5.2 For new standards the standardizing body shall organize a second round of public consultation lasting at least 30 days.	
Procedures	<b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include a requirement for the second round of consultation.

PEFC ST 1001:2017, 6.6	
6.6 The standardizing body shall organize pilot testing of new standard(s) to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 5.7 states that “The NCCF shall organize pilot testing of the new standards and the results of the pilot testing shall be considered by the Standard development group, or its constituted working group/ committee”.</p> <b>Conclusion: Conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.

PEFC ST 1001:2017, 7.1	
7.1 The standardizing body shall approve the standard(s)/normative document(s) formally when there is evidence of consensus among the working group.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.1 states that: “The NCCF Governing Body shall formally approve the standards based on evidence of consensus reached by the standard development group. All standards shall be approved by the Governing Body of NCCF”.</p> <b>Compliance: Conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement.

PEFC ST 1001:2017, 7.2.1	
7.2.1 The formally approved standard(s)/normative document(s) shall be published and made publicly available at no cost within 14 days of approval, or as otherwise defined by the standardizing body.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.2 states that: “The formally approved standards documents shall be published in a timely manner and made publicly available on website of NCCF within 30 days of approval or as otherwise advised by the Governing Body in case of any changes suggested in the standard”.</p> <b>Compliance: Conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 satisfies the requirement. The NCCF's procedures satisfy the clause “as otherwise defined by the standardizing body”.

**PEFC ST 1001:2017, 7.2.2**

7.2.2 Standard(s) shall include: a) identification and contact information for the standardizing body, b) official language of the standard, c) a note that when there is inconsistency between versions, the English version of the standard as endorsed by the PEFC Council is the reference. d) The approval date and the date of next periodic review.

Procedures

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 does not define the mandatory elements of the standards”.

**PEFC ST 1001:2017, 7.2.3**

7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any).

Procedures

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 does not include requirements for availability of the printed copies.

**PEFC ST 1001:2017, 7.2.4**

7.2.4 The standardizing body shall make the development report (refer to PEFC GD 1007) publicly available.

Procedures

NCCF STD SSP 01/2015, chapter 5.10 states that: “Documentation on the implementation of the standard-setting process shall be made publicly available”.

**Compliance: Conformity**

**Justification:** NCCF STD SSP 01/2015 satisfies the requirement although it uses a more general term “documentation”.

**PEFC ST 1001:2017, 8.1**

8.1 The standard(s)/normative document(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard’s implementation and a gap analysis. If necessary, a stakeholder consultation shall be organized to obtain further feedback and input.

Procedures

NCCF STD SSP 01/2015, chapter 6.2 states that “The standards documents shall be reviewed and revised at intervals that do not exceed a five-year period and as and when required. The procedures for the revision of the management standards shall follow procedures set out in Section 5”.

**Compliance: Conformity**

**Justification:** NCCF STD SSP 01/2015 satisfies the requirement although it does not specify that the review shall be based on consideration of feedback and a gap analysis.

**PEFC ST 1001:2017, 8.2.1**

8.2.1 The standardizing body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardizing body and/or PEFC National Governing Body with clear directions for providing feedback.

Procedures

**Compliance: Minor non-conformity****Justification:** NCCF STD SSP 01/2015 does not include requirements for the feedback mechanism.**PEFC ST 1001:2017, 8.2.2**

8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.

Procedures

**Compliance: Minor non-conformity****Justification:** NCCF STD SSP 01/2015 does not include requirements for the feedback mechanism.**PEFC ST 1001:2017, 8.3.1**

8.3.1 At the start of a review, the standardizing body shall evaluate the standard against appropriate PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard.

Procedures

**Compliance: Minor non-conformity****Justification:** NCCF STD SSP 01/2015 does not include requirements for the gap analysis.**PEFC ST 1001:2017, 8.3.2**

8.3.2 The standardizing body shall consider the latest scientific knowledge, research and relevant emerging issues.

Procedures

**Compliance: Minor non-conformity****Justification:** NCCF STD SSP 01/2015 does not include requirements for the gap analysis.**PEFC ST 1001:2017, 8.4.1**

8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardizing body shall organize stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardizing body shall include the gap analysis in the stakeholder consultation.

Procedures

**Compliance: Minor non-conformity**

	<b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the stakeholder consultation (a part of the review process).
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**PEFC ST 1001:2017, 8.4.2**

8.4.2 At the start of a review, the standardizing body shall update the stakeholder identification mapping (refer to clause 6.2)

Procedures	<b>Compliance: Minor non-conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the stakeholder consultation (a part of the review process).
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**PEFC ST 1001:2017, 8.4.3**

8.4.3 The standardizing body shall organize: a) a public consultation period of at least 30 days (following the requirements of clause 6.5.1) and/or, b) stakeholder meetings.

Procedures	<b>Compliance: Minor non-conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the stakeholder consultation (a part of the review process).
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**PEFC ST 1001:2017, 8.4.4**

8.4.4 The standardizing body shall announce the review in a timely manner (refer to 6.3).

Procedures	<b>Compliance: Minor non-conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the announcement of the review process.
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**PEFC ST 1001:2017, 8.5.1**

8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardizing body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.

Procedures	<b>Compliance: Minor non-conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the decision making within the review process.
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<b>PEFC ST 1001:2017, 8.5.2</b>	
8.5.2 The decision shall be made at the highest decision-making level of the standardizing body.	
Procedures	<b>Compliance: Minor non-conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the decision making within the review process.

<b>PEFC ST 1001:2017, 8.5.3</b>	
8.5.3 Where the decision is to reaffirm a standard, the standardizing body shall provide a justification for the decision and make the justification publicly available.	
Procedures	<b>Compliance: Minor non-conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the decision making within the review process.

<b>PEFC ST 1001:2017, 8.5.4</b>	
8.5.4 Where the decision is to revise the standard, the standardizing body shall specify the type of revision (normal or editorial revision).	
Procedures	<b>Compliance: Minor non-conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 does not include requirements for the decision making within the review process.

<b>PEFC ST 1001:2017, 9.1</b>	
9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6. A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.2 states that “The standards documents shall be reviewed and revised at intervals that do not exceed a five-year period and as and when required. The procedures for the revision of the management standards shall follow procedures set out in Section 5”.</p> <b>Compliance: Conformity</b> <b>Justification:</b> NCCF STD SSP 01/2015 requires revision to comply with chapter 5, i.e. the process for the development of new standards.

**PEFC ST 1001:2017, 9.2**

9.2 Editorial revisions can be made without triggering the normal revision process. The standardizing body shall approve the editorial changes formally and publish an amendment or a new edition of the standard.

Procedures

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 does not include requirements for the editorial changes.

**PEFC ST 1001:2017, 9.3.2**

9.3.2 A time-critical revision can be conducted only in the following situations: a) Change in national laws and regulations affecting compliance with PEFC International requirements b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision.

Procedures

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 does not include requirements for the time-critical revision.

**PEFC ST 1001:2017, 9.3.3**

9.3.3 The time-critical revision shall follow these steps: a) The standardizing body shall draft the revised standard, b) The standardizing body may consult stakeholders, but it is not mandatory, c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardizing body, d) The standardizing body shall explain the justification for the urgent change(s) and make the justification publicly available.

Procedures

**Compliance: Minor non-conformity**

**Justification:** NCCF STD SSP 01/2015 does not include requirements for the time-critical revision.

**PEFC ST 1001:2017, 9.4.1**

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

Procedures

NCCF STD SSP 01/2015, chapter 6.4 states that "The revision shall define the application date and transition date of the revised standards documents".

**Compliance: Conformity**

**Justification:** The procedures require to define both, the application as well as the transition date.



PEFC ST 1001:2017, 9.4.2	
9.4.2 An application date shall not be more than one year after the publication of the standard. This allows time for endorsement of the revised standard(s)/normative document(s), introduction of change(s), information dissemination and training.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.5 states that “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 documents, introducing the changes, information dissemination and training”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> The procedures define for the application date a maximum of one year from the standard’s publication.</p>

PEFC ST 1001:2017, 9.4.3	
9.4.3 The transition period shall not exceed one year. The standardizing body may determine a longer period when justified by exceptional circumstances.	
Procedures	<p>NCCF STD SSP 01/2015, chapter 6.6 states that “The transition date shall not exceed a period of one year except in justified exceptional circumstances where the implementation of the revised standards documents requires a longer period”.</p> <p><b>Compliance: Conformity</b></p> <p><b>Justification:</b> NCCF STD SSP 01/2015 satisfies the PEFC requirement.</p>

## Annex F: Stakeholders representation in the SDG and TWG

	Name	Details	Stakeholder group	Member SDG /TWG
1.	Mr. A K Varma	IFS (retd), Former Principal Chief Conservator of Forests and Head of Forest Force, Karnataka State Forest Department		Chairman SDG & TWG
2.	Mr. Suneel Pandey	IFS (retd), Vice President – Raw Materials ITC PSPD	Business and Industry	SDG & TWG
3.	Mr. Khumanthem Devabrata Singh	Sun polo	Business and Industry	SDG
4.	Dr. Manmohan Yadav	Associate Professor, Indian Institute of Forest Management (IIFM)	Research institute	Member – SDG & TWG
5.	Dr. Rajiv Pandey	Indian Council of Forestry Research and Education (ICFRE)	Research institute	Member- SDG & TWG
6.	Dr. Srikanta K Pangrahi	Director General Indian Institute of Sustainable Development	Research institute	Member – SDG
7.	Mr. R C Khuntia	Representative of Building Wood Workers International	Trade unions	Member – SDG & TWG
8.	Mr. Philip Tapsall	(Former) Director – Sustainable Business, WWF-India.	NGO	Member – SDG & TWG
9.	Ms. Rebecca Aranha	(Former) Manager – Sustainable Business, Forestry, WWF- India	NGO	Member - SDG & TWG
10.	Mr. Aditya Petwal	Coordinator, Leaders for Nature IUCN	NGO	Member – SDG
11.	Mr. Pravir Deshmukh	Confederation of Indian Industry (CII)	Business and Industry	Member – SDG
12.	Mr. A K Bansal	FS (retd), former Additional Director General of Forests, MoEFCC		Member – SDG
13.	Mr. Akhilesh Singh	Manager- Forestry, IORA Ecological Solutions	Business and Industry	Member – SDG
14.	Mr. Amit Anand	CEO, Carbon Check India Private Limited	Business and Industry	Member – SDG
15.	Mr. Sushil Sehgal	Individual capacity		
16.	Mr. B H Patel	Chairman, Plywood & Allied Product Panel, Chemical and Allied Export Promotion Council of India (CAPEXIL), Patel Wood Syndicate	NGO/Business and Industry	Member – SDG
17.	Mr. I V Rama Rao	Chair and Managing Director, CIBART	NGO	Member – SDG
18.	Ms. K Rathna	Chief Operating Officer, Center for Indian Bamboo Resource and Technology (CIBART)	NGO	Member – SDG
19.	Mr. Sanjeev Vasudev	STADD Development Consulting Pvt. Ltd.	NGO	Member- SDG
20.	Ms. Taruna	Manager, Natural Resource Management, GIPL	Business and Industry	Member- SDG
21.	Ms. Deepali Rautela	Assistant Director, NCCF		Member – SDG & TWG
22.	Dr Manish Pande	Joint Director, QCI PADD	Accreditation Body	Member- SDG & TWG

### **Annex G: Comments from the PEFC Council's international consultation**

The PEFC Council has announced at its website an international consultation on the endorsement of the NCCF scheme.

No comment had been received by the consultation deadline.

## **Annex H: Stakeholders survey (FORM used in the survey)**

**TJ**Consulting, Luxembourg

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# Stakeholders' questionnaire

Assessment of the NCCF forest certification scheme (India)  
against the requirements of the PEFC Council

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1 September 2018

## Background

The NCCF standard (NCCF - Network for the Certification and Conservation of Forests) for sustainable forest management and NCCF forest certification scheme for India were submitted for endorsement by the PEFC Council.

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

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

Stakeholders are free and encouraged to further distribute the questionnaire to another stakeholders in India.

## Objective

This questionnaire aims at obtaining and considering stakeholders comments and views relating to the development and revision of the NCCF scheme, in particular its forest management standard with requirements for forest management, its openness, transparency, stakeholders' participation and consensus building elements.

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

The questionnaire shall be returned to TJConsulting ([tymrak@tj-consult.com](mailto:tymrak@tj-consult.com)) by **30 September 2018**. In case of an additional time needed, please contact Mr Tymrak directly.

## Questionnaire

### 1. Contact details

Name of the organisation:

Stakeholder group:

E-mail:

### 2. Have you noticed a public announcement made by Network for the Certification and Conservation of Forests (NCCF) relating to the start of the development/revision of the NCCF scheme and invitation of stakeholders to participate?

- ☐ Yes ☐ No
- ☐ at the NCCF or related website
- ☐ by NCCF or related body's press release
- ☐ at public magazine and media
- ☐ by direct mailing

Note:

### 3. Did you have access to the standard setting procedures/ rules for the development of the NCCF forest management standard?<sup>7</sup>

- ☐ Yes ☐ No

Note: Yes

### 4. Have you been invited to nominate your representative to NCCF Standard Development Group (SDG) and Technical Working Group (TWG) (stakeholder bodies responsible for the development of NCCF standard(s) and consensus building)<sup>8</sup>

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

Note:

<sup>7</sup> A written document containing organisation and procedures of the standard setting/revision process.

<sup>8</sup> PEFC requires that the standardisation body shall establish a working group/committee with responsibilities for the development of a standard(s) and consensus building that is (i) accessible to stakeholders; (ii) has balance representation of stakeholders' decision making and (iii) includes stakeholders with expertise in the subject matter and materially affected stakeholders (PEFC ST 1001:2010, 4.4).

**5. Have you noticed the public consultation on a draft NCCF forest management standard/scheme?**

- ☐ Yes ☐ No
- ☐ at the website
- ☐ by NCCF or related body's press release
- ☐ at public magazine and media
- ☐ by direct mailing

Note:

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

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

Our comments:

- ☐ were considered
- ☐ were not considered

Note:

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

- ☐ Yes ☐ No

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

**For those stakeholders that had their representative in a NCCF Standard Development Group (SDG) and Technical Working Group (TWG)**

**8. Was the work of the SDG and TWG been organised in an open and transparent way?<sup>9</sup>**

☐ Yes

☐ No

Note:

**9. Have stakeholders reached the consensus on the content of the NCCF forest management standard?**

☐ Yes

☐ No

Note:

### **Other comments**

**9. Other comments and views on the NCCF standard setting/revision process or content of the scheme?**

<sup>9</sup> PEFC Council requires that members of the working group/committee responsible for the development of a standard(s) shall have access to draft documents in a timely manner; shall be given opportunity to participate in its work and submit their comments; their comments shall be considered in a transparent way.



## Annex I: Report from visit to India

The visit to India was conducted by Mr. Jaroslav Tymrak during four days from 26 – 29 November 2018.

### Objective of the visit

The objective of the visit was:

- Gathering additional information on the standard setting process and verification of the information submitted as a part of the scheme application, mainly through interview of the applicant's office and relevant stakeholders' interview;
- Evaluation of organisational relationships and tasks of different bodies involved in the implementation of the scheme.
- Clarification of issues and non-conformities identified in the draft interim report.

### Program and timetable of the visit

Date	26 November 2018	27 November 2018	28 November 2018	29 November 2018
Day	Monday	Tuesday	Wednesday	Thursday
Itinerary	<b>Opening meeting</b> Introduction of the scheme Presentation of findings of the draft interim report	<b>Stakeholders' interview</b>	<b>Stakeholders' interview</b>	<b>Stakeholders' interview</b>
	<b>Stakeholders' interview</b>	Clarification of issues and non-conformities identified in the draft interim report	Clarification of issues and non-conformities identified in the draft interim report	<b>Closing meeting</b>

## Stakeholders visited and interviewed

Mr. Tymrak met during the Indian's visit a large number of stakeholders relevant to the NCCF process.

The following topics were discussed:

- a) Introduction of the interviewed stakeholder, its organization, interest in forestry and NCCF's process;
- b) Participation in the NCCF standard setting process;
- c) Main topics of the forest management standard relevant to the stakeholder.

The following organizations have been met and interviewed:

<b>NCCF office</b>	Dr Ajay Kumar Saxena (Deputy Director)
	Ms Deepali Rautela (Assistant Director)
	Mr Varun Grover (Group coordinator)

<b>Conformity assessment</b>	
Quality Council of India	Dr Manish Pande
NRM-FM (certification body)	Ms Taruna Singh

<b>NGOs and Institutes</b>	
CIBART (Bamboo association)	Ms K Rathna (COO)
	Mr. R Rao (CEO)
IUCN	Mr. Aditya Petwal
IFS (government – retired, Chairman SDG)	Mr. A K Varna
Indian Institute of Sustainable Development (IISD)	Dr S K Panigrahi
IIFM (Indian Institute for Forest Management)	Dr. Manmohan Yadav

<b>Forest based industry</b>	
ITC-PSPD	Mr. Suneel Kumar Pandey
CII (Confederation of Indian Industry)	Mr. Pravir Deshmukh
SAPPI	Terry Stanger

<b>Government, forest service</b>	
IFS (Indian Forest Service)	Dr Devendra Pandey (retired)
	Mr. A K Bansal (retired)

## Annex J: PEFC International internal review report

4 January 2019

**PEFC International Secretariat's "Internal Review" comments on TJConsulting's report "Assessment of the NCCF forest certification scheme (India) against the requirements of the PEFC Council Final draft report, 21 December 2018"**

### General Statement

Having reviewed the report, the PEFC Secretariat has confidence that the assessor has conducted a thorough evaluation of the NCCF system against PEFC's benchmark requirements.

The majority of comments in the table below are merely of editorial nature, where the Secretariat is of the view that adjusting the report might be helpful for a better understanding, consistency or easier reading.

Fewer comments are related to the assessor's conclusions/justifications. A couple of questions are asked concerning potentially ambiguous wording and details of the assessment process.

The assessor has considered all editorial as well as material comments and amended the certification report accordingly. The following table only includes material comments.

### Comments

#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
3	5.1, 5.2, 8.2.3, 8.2.4	comment	"PEFC ST 1001"	As this assessment was carried out against PEFC ST 1001:2010 and PEFC ST 1001:2017 it could be helpful, if the complete document title	Done

#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
				including year of issuance was used, instead of just PEFC ST 1001.	
9	5.3	comment	"The document is of <b>very high quality</b> (...)"	Consider elaborating in more detail on what "very high quality" means in this context.	Done
26	p. 25	question	"The NCCF decided to officially <b>launch</b> the forest management standard (and the scheme) at the national conference held on 13 January 2018."	It is not clear what is meant with "official launch". Was that a publication event or also the date as of which the standard entered into force the first time?	<p>The Standard was originally formally approved on 9 September 2017. As the standard does not include the "application date" or a "date of entry into force", it is expected that the standard could be used from this date on. The standard itself has been placed at the NCCF's website (However, it was not possible to verify when) and then in January 2018 the NCCF organised an international conference where they publicly announced the forest management standard being approved.</p> <p>The publication event is considered as placing the document in a public domain, i.e. publishing it at the NCCF's website. It should be noted that the draft interim report included a minor non-conformity for this requirement based on the fact of uncertainty of the publication at the NCCF's website. The non-conformity has been lifted up based on the fact that the amended standard (12 December 2018)</p>

#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
					was immediately published at the NCCF's website.
27	8.2.4	comment/question	<p>"TJConsulting distributed a questionnaire to more than 500 stakeholders in India that covered all stakeholder groups relevant to sustainable forest management with a request to provide feedback on the standard setting/revision process of the NCCF scheme." (...) "The results of the survey were taken into consideration in the scheme assessment. However, it should be noted that any interpretation of the survey results should take into consideration the limited number of received responses and the fact that the responses are not balanced according to stakeholders' categories."</p>	<p>This is quite a high number of stakeholders contacted. That only so few responses to the assessor were submitted is disappointing, but not surprising.</p> <p>While it is not required by PEFC to send out reminders to stakeholders in such stakeholder surveys, did the assessor do so? Would the assessor recommend PEFC to require or recommend to do so, or suggest other measures to get a little bit more stakeholder feedback in stakeholder surveys in future? Or can a small number of respondents be sufficient to verify an applicant scheme's records and claims on the standard setting process?</p>	<ul style="list-style-type: none"> <li>- The high number of stakeholders contacted was due to the fact that the NCCF has carried out a comprehensive stakeholders mapping.</li> <li>- The invitation was sent out by the assessor but the reminder was also sent out by the NCCF itself.</li> <li>- A reminder is always good practice to do and can increase a number of respondents. However, also from previous assessments the number of responses is usually small and this also applies for the PEFC international consultation.</li> <li>- The questionnaire alone is difficult to use as the only evidence but it should be used as complementary, together with stakeholders interview during the stakeholder mapping. The primary evidence should always be written records kept by the applicant. Higher level of relevancy is concerning the questions relating to the work of the working group/committee when a more significant share of members responds.</li> </ul>

#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
39	8.5	comment	"Based on this fact, <b>it can be assumed</b> that the applicant intends to use the PEFC International Chain of Custody Standard, PEFC ST 2002 for the purposes of chain of custody certification."	An assumption is insufficient. A revision of wording or judgement is required.	There is a clear assessment statement. The quoted "assumption" claim only relates to the assessment approach that has been chosen as the applicant has the right to (i) either use PEFC ST 2002 or to (ii) use its own national CoC standard. Unless the assessment is completed, this is "just assumption".  However, the wording has been amended.
40	8.5	comment	<p>"Conclusion</p> <p>The NCCF adopted the PEFC international standard for chain of custody (PEFC ST 2002:2013) indirectly through mandatory references in notification procedures.</p> <p>The scheme satisfies the PEFC requirements for chain of custody."</p>	This conclusion is not satisfactory. Even if the assessor and the PEFC Secretariat have confidence that indeed PEFC ST 2002 is used in practice as the NCCF system's CoC standard, it should be clearly stated on a higher level in the system than in the notification procedures, e.g. either in a system description or another official statement, that PEFC ST 2002 is adopted as CoC standard of the NCCF system.	<p>The requirement for the usage of PEFC ST 2002 in the NCCF document for notification (NCCF-STD-NCB 01/2017) provides strong confidence that the PEFC ST 2002 is used for the CoC certification:</p> <ul style="list-style-type: none"> <li>- NCCF consists of 7 nationally developed documents. All of them are mandatory and all of them are identified as standards – STD (NCCF-STD-NCB 01/2017). Based on this, it is evident that statements / requirements made in any of those documents have an equal value.</li> <li>- NCCF-STD-NCB 01/2017 has been formally adopted by the NCCF's Governing Body, it is an "official statement". The document will be a part of the PEFC endorsement and</li> </ul>

#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
					<p>any changes in it would require a new PEFC endorsement decision.</p> <ul style="list-style-type: none"> <li>- The document (NCCF-STD-NCB 01/2017) is mandatory and includes an explicit requirement that the certification body shall carry out chain of custody certification against PEFC ST 2002. The document does not provide any other option that would be recognised by the NCCF.</li> <li>- In addition, the document (NCCF-STD-NCB 01/2017) also includes a contract between the NCCF and the certification body. The contract explicitly states that the certification body shall carry out chain of custody certification against PEFC ST 2002.</li> <li>- The "notification" mechanism is the only mechanism through which the PEFC Council and its PEFC NGBs, including NCCF, can enforce which certificates are recognised by the PEFC Council (and NCCF).</li> <li>- Concerning communication of which document is to be used for the purposes of the CoC certification, PEFC ST 2002 is placed amongst the scheme documents at the NCCF website.</li> </ul>

#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
41	8.6.1	comment	<p>"Conclusion</p> <p>The NCCF adopted the PEFC international standard PEFC ST 2003 indirectly through mandatory references in notification procedures (the notification contract). The NCCF scheme has not developed any scheme specific requirements for chain of custody certification bodies.</p> <p>The scheme satisfies the PEFC requirements for certification bodies operating chain of custody certification."</p>	<p>This conclusion is not satisfactory. Even if the assessor and the PEFC Secretariat high confidence that indeed PEFC ST 2003 is used in practice as the NCCF system's CoC CB requirements, it should be clearly stated on a higher level in the system than in the notification procedures, e.g. either in a system description or another official statement, that PEFC ST 2003 is adopted as CoC CB requirements of the NCCF system.</p>	<p>See argumentation above.</p>
42	Annex A, PEFC ST 1001, 4.1 a-f	comment	<p>Content of the column containing system requirements and the assessor's conclusion and justification.</p>	<p>This column should not only contain references to the relevant parts of the applicant system and a summary of the systems requirements, but also actual quotations of the <u>most important wording</u> demonstrating compliance with the PEFC requirement in question. This should enable the reader to gain confidence that the system is indeed meeting PEFC requirements from reading the report alone, without having to consult the scheme documentation.</p> <p>It is noted that the assessor does indeed provide quotations in the vast majority of requirements in this</p>	<p>The requirements (4.1.a-f) are general requirements for the content of the standard setting procedures which are then in detail addressed by following requirements. This is why the report conclusions for those requirements include a statement "It should be noted that this statement only reflects presence of procedures, not whether those procedures are appropriate or not".</p> <p>The following statement will be added to the conclusions: "Detailed evaluation of the procedures for the standard setting process (or dispute resolution, etc according to 4.1a-f) is included under the</p>



#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
				checklist. It would be ideal if this was also the case in the very beginning of this checklist.	PEFC requirements (to list the PEFC requirements)".
44	PEFC ST 1003, 4.1c, p. 91	comment	<p>"Conclusion: Conformity</p> <p>Justification: The Standard requires compliance of the sub-contracted parties with the provisions of the forest management plan."</p>	It should be explained in more detail how compliance of sub-contractors with the FMP ensures their compliance with all requirements of the FM standard. If compliance with the FMP does not ensure compliance with all requirements of the FM standard, then the conclusion should not be that this PEFC requirement is fully met, based just on Indicator 3.2.5 alone.	<p>The conformity statement has also been made based on the following facts:</p> <ul style="list-style-type: none"> <li>- The requirements for the FMPs in the Standard are very detailed and include relevant parts of the Standard relating to operations, i.e. the parts that are also relevant to sub-contractors when employed.</li> <li>- In addition, the Standard includes a wording for its requirements starting with "FME shall ensure...". This implies that it shall ensure compliance regardless of whether the work was performed by the FMU itself or by a contracted party.</li> </ul>
4 5	Annex 6 of the PEFC TD, 3.2, p. 156	comment	"Conclusion: Not mandatory requirement"	Further explanation should be added to help the reader understand the assessor's conclusion.	The wording has been amended with an explanatory note that the PEFC requirement is introduced with a wording "should".
4 6	Annex 6 of the PEFC TD, 4, p. 160	comment	"Conclusion: Not mandatory requirement"	Further explanation should be added to help the reader understand the assessor's conclusion.	The wording has been amended with an explanatory note that the PEFC requirement is introduced with a wording "should".

#	Report chapter / page	Type of comment (comment; question; editorial)	Assessor's report statement	Secretariat's comment	Assessor's response
47	Annex 6 of the PEFC TD, 5, p. 162	comment	"Justification: NCCF STD ACB 1/2017, Annex 1 requires that the certificates shall bear an accreditation body's symbol. This ensures that the certificate is issued within the scope of the valid accreditation and is considered as the "accredited certificate"."	The justification seems to be for another PEFC requirement.	<p>The following text has been added to the justification:</p> <ul style="list-style-type: none"> <li>- The certification body is required to have the NCCF forest management standard in the accreditation scope;</li> <li>- ISO 17011 (that is required to be followed by all IAF MLA signatories) requires (8.3.1) that the certification body can only use the accreditation symbol on certificates issued within the scope of its accreditation, i.e. "the accredited certificate".</li> </ul>

