



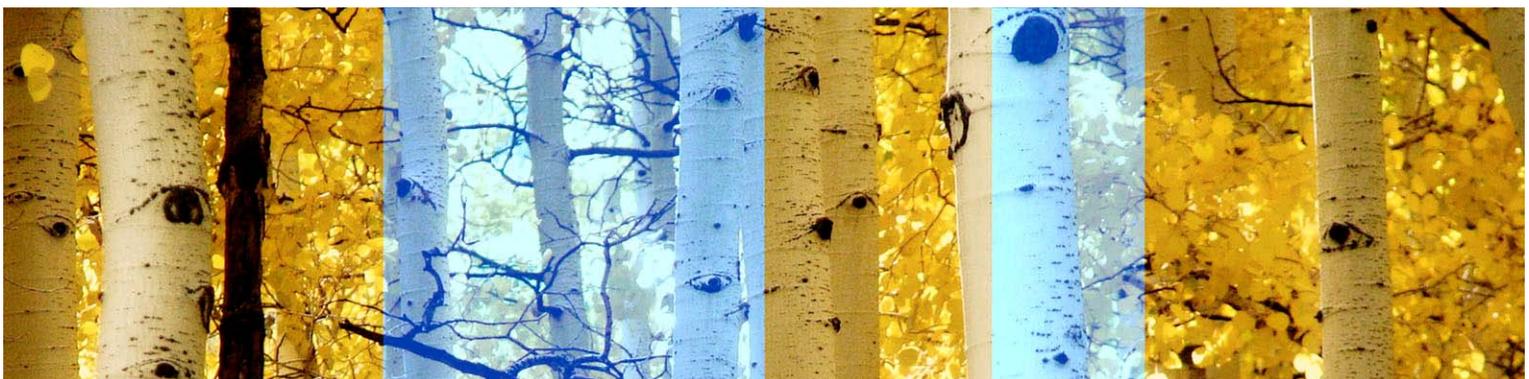
Indufor ...forest intelligence

PEFC Council

**Evaluation and Assessment of the Revised PEFC CERFLOR
Brazilian Certification Program against the Requirements of the
PEFC Council**

Final Report

Helsinki
January 14, 2011





Indufor

DISCLAIMER

Indufor makes its best effort to provide accurate and complete information while executing the assignment. Indufor assumes no liability or responsibility for any outcome of the assignment.

Copyright © 2011 Indufor Oy

All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means, electronic or mechanical, including, but not limited to, photocopying, recording or otherwise.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION	4
1.1 Reporting	4
2. RECOMMENDATION TO THE PEFC COUNCIL BOARD OF DIRECTORS	5
3. MATERIAL AND METHODS USED IN THE ASSESSMENT	6
4. STRUCTURE OF THE BRAZILIAN FOREST CERTIFICATION PROGRAM	8
4.1 Scheme organization	9
5. STANDARD SETTING FOR CERTIFICATION	11
5.1 Background	11
5.2 Consultant's conclusions	11
6. REQUIREMENTS FOR CERTIFICATION SCHEMES AND THEIR IMPLEMENTATION	19
6.1 Background	19
6.2 Consultant's conclusions	19
7. PERFORMANCE REQUIREMENTS / ITTO GUIDELINES	27
7.1 Compatibility with ITTO guidelines for management of plantation forests (Part V)	27
8. REQUIREMENTS FOR CERTIFICATION BODIES AND PROCEDURES	32
8.1 Background	32
8.2 Consultant's conclusions	32
9. STAKEHOLDER VIEWS	39
9.1 Summary of comments submitted by PEFC council members and stakeholder questionnaire	39
9.2 International consultation	39
10. RESPONSES TO THE COMMENTS OF PANEL OF EXPERTS	1

LIST OF ANNEXES

Annex 1	PEFC Council Minimum Requirements Checklist
Annex 2	Stakeholder questionnaire sent to stakeholders

LIST OF FIGURES

Figure 4.1	INMETRO organization chart	8
Figure 4.2	Organization and implementation arrangements of the CERFLOR standards	10

LIST OF TABLES

Table 6.1	Ratification of the Core ILO and Other Relevant Conventions	21
Table 7.1	Scale of assessment	27
Table 7.2	Compliance of the CERFLOR (2010) standard with the ITTO guidelines and selected PEFC requirements	28

ABBREVIATIONS

AB	Accreditation Body
ABNT	Brazilian Association for Standardization
CAB	Conformity Assessment Body
CBAC	Brazilian Conformity Assessment Committee
CB	Certification Body
CBN	Brazilian Standardization Board
CERFLOR	Brazilian Program for Forest Certification
Cgcre	Accreditation General Coordination
CoC	Chain of custody
CONMETRO	Brazilian National Council of Metrology, Standardization and Industrial Quality
Dicor	Division of Accreditation of Certified Bodies
Dipac	Conformity Assessment Programs Division
Dqual	Quality Directorate
EIA	Environmental Impact Assessment
FMU	Forest Management Unit
IAF	International Accreditation Forum
ILO	International Labor Organization
INMETRO	Brazilian National Institute of Metrology, Standardization and Industrial Quality
ISO	International Organization for Standardization
ITTO	International Tropical Timber Organization
MMA	Ministry of the Environment
MDIC	Ministry of Development, Industry and Foreign Trade
NBR	Norma Brasileira – Brazilian Standard
NFI	National Forest Inventory
NGO	Non-governmental Organization
OCF	Forest Management Certification Body
ONS	Bodies of Sectorial Standardization
PEFC	Programme for the Endorsement of Forest Certification schemes
PEFCC	PEFC Council
PEOLG	Pan European Operational Level Guidelines
SBAC	Brazilian System of Conformity Assessment
SBS	Brazilian Society for Silviculture
Seapo	Operational Support Section for Conformity Assessment
SFM	Sustainable Forest Management
SINMETRO	Brazilian National System of Metrology, Standardization and Industrial Quality



Indufor

EXECUTIVE SUMMARY

CERFLOR, the Brazilian scheme for forest management certification became a part of the Brazilian System for Standardization in March 2001 and CERFLOR program was launched in August 2002. CERFLOR scheme includes standards for planted forests, native forest and chain of custody (CoC). Standards for planted forests and CoC were launched in 2001 and standard for native forests followed in 2004. CERFLOR program was endorsed by PEFC Council in 2005.

Standard revision process was carried out in 2007 and 2009 and the formally agreed revised standards and scheme documentation were submitted to the PEFC Council in January 2010 for re-endorsement. Indufor Oy was contracted by the PEFC Council to carry out the assessment of the revised CERFLOR scheme against the requirements of the PEFC Council.

This assessment covers the conformance of the CERFLOR Standards with ITTO Guidelines and standard development and scheme implementation arrangements against the requirements of the PEFC Council. PEFC Council will nominate a Panel of Experts to review the final draft report. The comments received from the Panel of Experts will be taken into consideration in the final report.

The documentation of the CERFLOR scheme (as submitted for PEFC Council in January 2010) meets the PEFC Council minimum requirements at sufficient level, with some exceptions presented below. CERFLOR standards give rather general requirements for forest management but complementing national legislation ensures the fulfilment of PEFC and ITTO requirement in most cases. However, a few non-conformities to the PEFC of minor significance requirements are found. In standard setting/revision procedures and accreditation non conformities arise from the institutional nature of CERFLOR as a part of the Brazilian Standardization System. ABNT (the standard setting organization) administrative rules have some minor differences compared to PEFC requirement but the rules provide the same outcome as the PEFC requirements. In forest management a few non conformities with minor significance and partial conformities are found which relate to monitoring, participation of local population, and crop and tree species diversification.

Recommendations and findings

Indufor recommends that PEFC Council re-endorses the CERFLOR scheme. The Scheme documentation complies with the PEFC requirements.

Standard setting is independent from certification and accreditation processes. Brazilian Association for Standardization (ABNT) formed a working group for CERFLOR standard. In the working group various interests participated (industry, government and civil society).

Both ABNT and INMETRO, the national accreditation body, and national PEFC national governing body, form a part of the national framework of SINMETRO - National System of Metrology, Standardization and Industrial Quality. INMETRO (National Institute of Metrology, Standardization and Industrial Quality) is the executive body of the National Council of Metrology, Standardization and Industrial Quality (CONMETRO) which governs SINMETRO. However, even though both standard development and accreditation are under the same system they can be considered independent from each other.

All stakeholders in the process of reviewing the national standards were invited to participate in the technical meetings for the standard revision including forest owners, forest industry, environmental and social non-governmental organizations (NGOs), trade unions, retailers and other relevant organizations.

In addition reviewed standards were sent out for national consultation which in most cases was 60 days. The only non-conformity found is the length of the consultation period for the



Standard for Native Forest. No changes were made in the standard as a result of Systematic Review and as a consequence the national consultation period was only 30 days which is not fully in compliance with PEFC requirements.

Even though some organizations decided not to participate (mainly social NGOs) standard review process can be seen as participatory process and in compliance with PEFC requirements.

CERFLOR standards are applicable in individual and group certification. The scheme includes specific rules for group certification. CERFLOR standards are applicable at national level and there is no regional certification in the CERFLOR scheme.

The CERFLOR forest management performance requirements for native forests and plantations rely in many issues on existing national legislation. The standard is in many aspects more general than the very detailed reference base, the ITTO guideline for the establishment and sustainable management of planted forests, ITTO guideline for the Sustainable Management of Natural Tropical Forests and ITTO guidelines on the Conservation of Biological Diversity in Tropical Production Forest. Non conformities of the standards are however mainly covered by the specific requirements of the laws and regulations of Brazilian forest and environmental legislation.

Non conformities which are not covered by legislation arise from the absence of requirement to establish permanent sample plots in natural forests (requirement for continuous inventory exists) and also a clear requirement to monitor social impacts is missing. Standard requirements for tree marking and post harvest inventory and special instructions for application of chemicals near watercourses partially conform to ITTO guidelines' requirements.

In the standard for planted forests non conformities are found in the absence of requirement of crop diversification. In addition there are some partial conformities in the standard. CERFLOR standard does not fully recognize and include environmental protective functions and diversity issues of planted forests. The standard does not enhance or introduce areal zoning approach where different zones are established to provide basic needs and to protect forest reserves, and the standard does not encourage or require development of multi-species plantation establishment and use or testing of native species.

The remaining non-conformities do not jeopardize the sustainability of the forest management as the standards comply mainly with the very detailed ITTO reference base. However, it is recommended that these non-conformities shall be addressed and corrected in the following standard revision.

Also, scope of monitoring should be specified in more detail and extended to cover environmental and social issues. Community consultation is only required through EIA procedures (requirement by the law) and is not required as a continuous practice. (See Annex 2 for details).

CERFLOR standards require compliance with current federal, state and municipal legislation as required by PEFC requirements.

CERFLOR adopted the PEFC Council Chain of Custody of Forest Based Products - requirements without any country specific alterations.

The scheme requires accredited certification that is in compliance with PEFC requirements. Certification bodies, auditors and the applied certification procedures shall meet the requirements of the PEFC Council, IAF and International Organization for Standardization (ISO).



Indufor

When the accreditation of the CB is done by Cgcre/INMETRO, the Cgcre (General coordination for accreditation) has a contract with the CB. When the accreditation is done by other accreditation body (AB) the contract is between Dqual (Quality Directorate)/INMETRO to ensure notification according to PEFC requirements.

The appeals mechanisms in CERFLOR scheme complies with the PEFC Council requirements.



1. INTRODUCTION

Brazilian PEFC Governing Body INMETRO applied to the PEFC for re-endorsement of the national forest certification scheme including standards for Forest Management (for Planted forests, Chain of Custody and for Native Forests) in January 2010. The revision of standards started in 2007 (standards for planted forests and chain of custody) and 2009 (standard for native forests) and the revised standards were approved by the ABNT technical committee as follows: standards for planted forests and CoC in July 2008 and standard for native forests July 2009. The revised scheme was submitted for the endorsement of the PEFC Council in January 2010.

Indufor Oy was contracted by the PEFC Council to carry out the evaluation and assessment of the revised CERFLOR Scheme against the requirements of the PEFC Council. This assessment covers the conformance of the CERFLOR Standards and Certification Scheme to the current PEFC Council requirements for standard setting and revision, and their implementation and certification process.

1.1 Reporting

The Interim report on the conformity of the CERFLOR Scheme standards and its revision and implementation procedures to the PEFC Minimum Requirement Checklist and ITTO Guidelines was sent to INMETRO in October 27, 2010. Some additional information from the INMETRO and ABNT was received in November 2010 and taken into consideration in this final draft report.

This final draft report was submitted to the INMETRO and PEFC Council in December 3, 2010. The final draft will be sent to the PEFC Panel of Experts that provides comments on the scope and consistency of the report. The comments received and Consultant's responses will be presented in Annex 5 to the final report.

In this final report the recommendations of Indufor Oy to the PEFC Council are presented in the Chapter 2 and in the Executive Summary. Chapter 3 presents material and methods used in this assessment and Chapter 4 the structure of the Brazilian certification program. Chapter 5 presents the conformity of standard setting process with the PEFC requirements, Chapter 6 evaluates the standard implementation rules and Chapter 7 reviews the compliance of the standard performance requirements. Chapter 8 evaluates the requirements for certification bodies and procedures and Chapter 9 discusses the process used to find stakeholder views on the standard and its development and the feedback received.

2. RECOMMENDATION TO THE PEFC COUNCIL BOARD OF DIRECTORS

Recommendations

Indufor recommends that PEFC Council re-endorses the CERFLOR scheme. The Scheme documentation conforms to the PEFC requirements despite the few non conformities.

- 1. *Independence of standard setting process conforms to PEFC requirements***
- 2. *Participatory process conforms to PEFC requirements***
- 3. *Levels of implementation conforms to PEFC requirements***
- 4. *Performance requirements partly conform to the ITTO Guidelines requirements***

The CERFLOR forest management performance requirements in the standards for native forests and plantations rely in many issues on existing national legislation. The standards are in many aspects more general than the very detailed reference base, the ITTO guideline for the establishment and sustainable management of planted forests, ITTO guideline for the Sustainable Management of Natural Tropical Forests and ITTO guidelines on the Conservation of Biological Diversity in Tropical Production Forest. Non conformities of the standards are however mainly covered by the specific requirements of the laws and regulations of Brazilian forest and environmental legislation (see remaining non conformities below).

Non conformities which are not covered by legislation arise from the absence of requirement to establish permanent sample plots in natural forests (requirement for continuous inventory exists) and also a clear requirement to monitor social impacts is missing. Standard requirements for tree marking and post harvest inventory and special instructions for application of chemicals near watercourses partially conform to ITTO guidelines' requirements.

In the standard for planted forests non conformities are found in the absence of requirement of crop diversification. In addition there are some partial conformities in the standard. CERFLOR standard does not fully recognize and include environmental protective functions and diversity issues of planted forests. The standard does not enhance or introduce areal zoning approach where different zones are established to provide basic needs and to protect forest reserves, and the standard does not encourage or require development of multi-species plantation establishment and use or testing of native species.

The remaining non-conformities do not jeopardize the sustainability of the forest management as the standards comply mainly with the very detailed ITTO reference base. However, it is recommended that these non-conformities shall be addressed and corrected in the following standard revision.

- 5. *Compliance to legislation is required according to PEFC requirements***
- 6. *Timber tracing conforms to the PEFC requirements***
- 7. *Certification and accreditation processes conform to PEFC requirements***
- 8. *Notification of the Certification Bodies is required according to PEFC requirements***
- 9. *Appeals procedures conform to PEFC requirements***

3. MATERIAL AND METHODS USED IN THE ASSESSMENT

This report is a conformity assessment of the revised CERFLOR scheme to PEFC Council requirements for a national forest certification scheme. Because it reviews a revised scheme that has already been endorsed by PEFC, it was carried out as a desk study and did not include a field visit to Brazil.

The assessment is based on the PEFC Council minimum requirement checklist and the PEFC Council technical documentation (as presented in the PEFC Council web page on 6.9.2010 <http://pefc.org/standards/technical-documentation>).

The assessment is based on the CERFLOR Scheme documentation as presented in the application for endorsement and on the information received in a stakeholder questionnaire and further information requested from INMETRO.

The scheme includes the following documents:

Forest and chain of custody performance standards:

- ABNT NBR 14789 – Forest Management – Principles, Criteria and Indicators for Planted- Forests
- ABNT NBR 14790 – Forest Management – Chain of Custody (translation of the PEFC TD Annex 4)
- ABNT NBR 15789 - Forest Management – Principles, Criteria and Indicators for Native Forests

Accreditation requirements for forest certification:

- NIT-DICOR-008 - Rev. 06 – JUN/2009 - Accreditation Criteria for Management System Certification Bodies
- NIT-DICOR-053 - Rev. 08 – JUN/2009 – Additional Criteria for Forest Management Certification Body on compliance to NBR 14789 and/or the NBR 15789
- NIT-DICOR-054 - Rev. 01 – APR/2009 – Mandatory IAF Documents for the Application of ABNT NBR ISO/IEC 17021:2007 - 1^a Edition (verbatim adoption of IAF Guidance on the Application of ISO/IEC 17021)
- INMETRO Specific Rule for PEFC Notification of Accredited Bodies

Accreditation requirements for chain of custody:

- NIT-DICOR-024 - Rev.02 - JUN/2009 - Criteria for the Accreditation of Products Certification Bodies and Product Performance Verification
- NIT-DICOR-057 - Rev. 02 – JUN/2009 - IAF Guidance on the Application of ABNT NBR ISO/IEC 65:1996 - 2^a Edition (verbatim adoption of IAF Guidance on the Application of ISO/IEC 65)
- INMETRO standards used by the Conformity Assessment of Chain of Custody - INMETRO Administrative Directive N^o. 369/09

Guidelines

- ABNT NBR 14793 – Guidelines for Forest Auditing – Audit Procedures – Qualification
- ABNT NBR 15753 - Forest Management — Guidance for the implementation of ABNT NBR 15789
- ABNT NBR 16789 - PN103:000.00-001 - Forest Management — Guidance for the implementation of ABNT NBR 14789



Indufor

The normative documents listed in the Annexes to the CERFLOR scheme documentation were taken into account in the assessment and additional evidence has been asked for, if deemed essential.

In addition to these documents, Indufor utilized the following data sources:

- INMETRO Application for Reassessment of the Brazilian Forest Certification Program (CERFLOR) Scheme, and Additional Improvements, with the Requirements of the PEFC Council
- INMETRO responses to PEFC Council Checklist
- Stakeholders' responses for stakeholder questionnaire.

For chain of custody certification CERFLOR Scheme applies the PEFC Council international rules and requirements for chain of custody certification. In addition CERFLOR CoC accreditation and certification procedures are guided by NIT-DICOR-024 - Rev.02 - JUN/2009 - Criteria for the Accreditation of Products Certification Bodies and Product Performance Verification and INMETRO standards used by the Conformity Assessment of Chain of Custody - INMETRO Administrative Directive N^o. 369/09.

During the assessment period the scheme was under international public consultation period convened by the PEFC Council. In addition to that, Indufor sent questionnaires on standard setting and scheme requirements to 161 stakeholder organizations. 16 stakeholder representatives responded to the questionnaire. Respondents represented stakeholder groups as follows:

1 Government, 2 Environmental NGOs, 2 Research institutions, 2 Forest industry organizations, 8 others stakeholder groups. No responses were received from forest owners or forest managers, social NGOs, or trade organizations.



Indufor

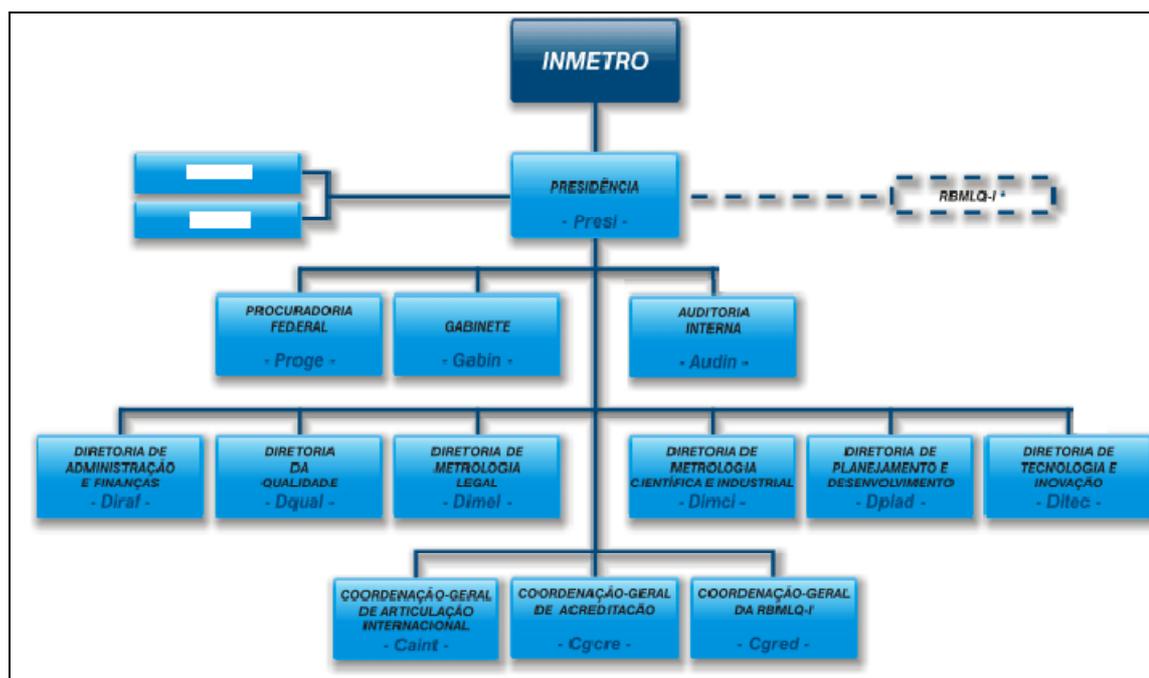
4. STRUCTURE OF THE BRAZILIAN FOREST CERTIFICATION PROGRAM

The structure of the CERFLOR – Brazilian Forest Certification Program has not had significant changes since its assessment in 2005. Any amendments, specifications and changes to the Scheme structure and implementation are taken into consideration in this report.

INMETRO, as the PEFC national governing body is a service organization managing the Brazilian Forest Certification Program covering forest management and chain of custody certification. The standard setting process was carried out at national level by the ABNT, following internationally agreed procedures on standardization. INMETRO is also the national accreditation body.

The national accreditation function is executed by the division of General Coordination of Accreditation (Cgcre) whilst management of the forest certification scheme by the PEFC National Governing body is under the responsibility of the Directory of Quality (Dqual). The responsibilities are defined in the governmental decree N° 82, of 1st of April, 2008, issued by the Ministry of Industry and Commerce. The independence of these two principal units is illustrated in the organization chart below (source: INMETRO Quality Manual, rev. 02).

Figure 4.1 INMETRO organization chart



Cgcre standard NIE-CGCRE-008-rev.3 – Risk Analysis of Potential Conflicts of Interests with Related Organizations requires compliance with ISO/IEC 17011 item 4.3.7. The standard requires organization to carry out an analysis of potential conflicts of interests, which has to be submitted for approval by the committee of interested parts (CONAC), acting within the sphere of accreditation. Since 2008, Cgcre identifies its' related organisms, the potential conflicts of interest, the action to eliminate or mitigates them, and afterwards presents them to CONAC, for its' approval. The procedures described above have been evaluated and approved by the 2008 Peer Evaluation undertaken by of IAF/ILAC for national accreditation bodies.

INMETRO has adopted the CERFLOR standards as a baseline for sustainable forest management in certified forest management. Compliance with the requirements stated in the



Indufor

standard is mandatory to forest owners and other parties undertaking forest management in certified forests.

CERFLOR is a voluntary program developed together with representatives from different stakeholders at a national level. These include representatives from producers, consumers, government, NGO's and other organizations, such as universities and research institutions. The Brazilian Government, through the Ministry of Development, Industry and Foreign Trade (MDIC) and the Ministry of the Environment (MMA), has supported the development of a national forest certification program.

The CERFLOR standards are applicable to individual and group certification. Regional certification is not an option in the scheme.

4.1 Scheme organization

CERFLOR was conceived by the Brazilian Society for Silviculture – SBS, with collaboration of several associations, entities, research institutes and NGO's, as a voluntary national forest certification program, in 1991. The process of discussion and development of CERFLOR - P, C & I – Principles, Criteria and Indicators was initiated in 1996 by SBS and ABNT.

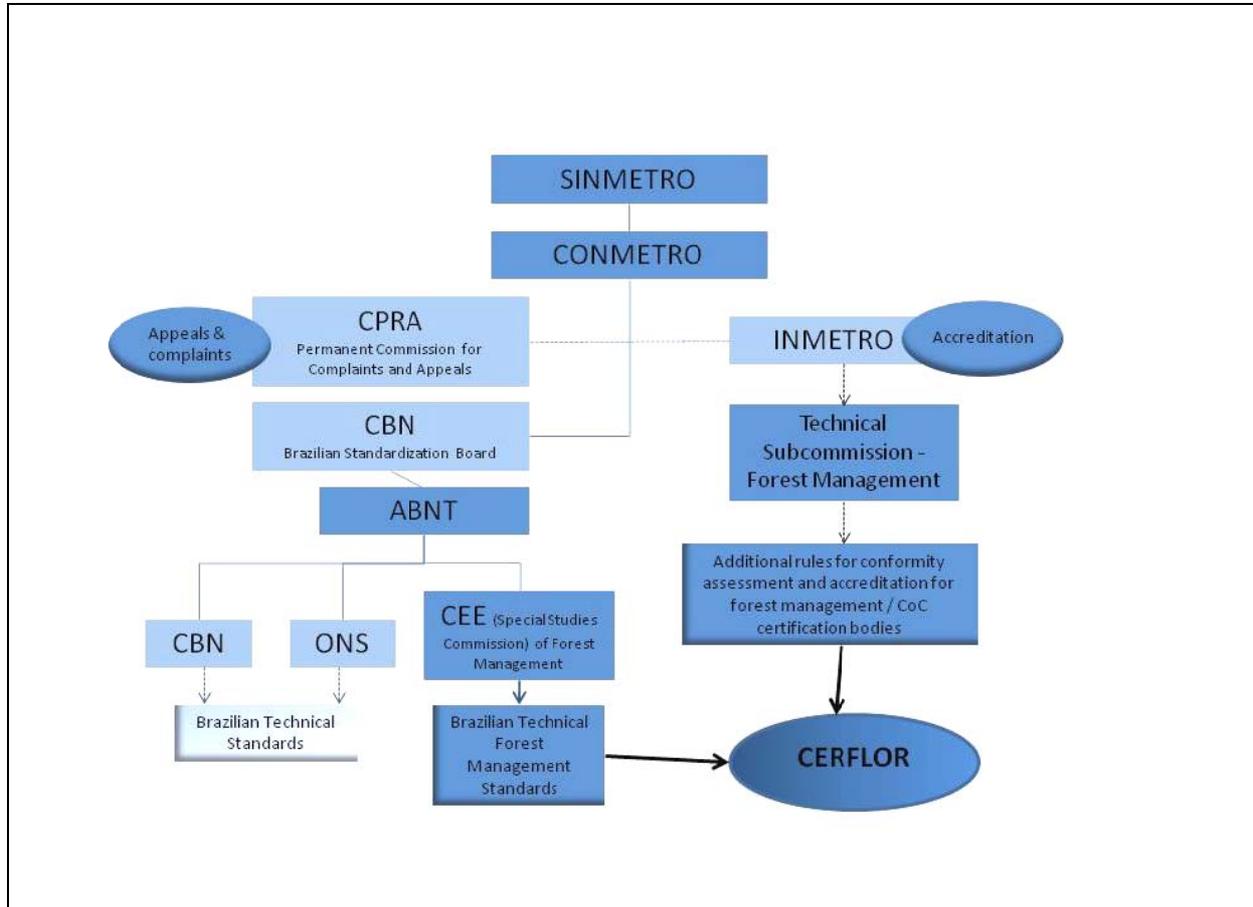
The Brazilian standardization system (SINMETRO - Brazilian National System of Metrology, Standardization and Industrial Quality), under which the CERFLOR scheme has been established, has independent divisions for standard setting and accreditation procedures.

ABNT is the national body for standardization and INMETRO (Brazilian National Institute of Metrology, Standardization and Industrial Quality) is the PEFC national governing body, national accreditation body and the manager of CERFLOR Program.

ABNT established a Study Commission, or in other words a Working Group (WG), which was proposed by CB or ONS (Bodies of Sectoral Standardization) according to the guidelines set forth in the ABNT internal rules and approved by the ABNT Technical Council. This Study Commission drafted and finally approved standards which were given a final approval after a National Consultation process and were subsequently submitted for PEFC endorsement.

Throughout the CERFLOR development process, ABNT has aimed at transparency, openness and wide stakeholder participation. Although they are under the same national standardization system, ABNT's study commission (or WG) has been and is independent from INMETRO as the accreditation body. INMETRO was invited in the working group as one participant but had no leading role in the standardization process.

Figure 4.2 Organization and implementation arrangements of the CERFLOR standards



CBN – Brazilian Committees

5. STANDARD SETTING FOR CERTIFICATION

5.1 Background

Standard revision

The development process for an ABNT standard follows the international rules established by the ISO Supplement – Procedures, specific to ISO 2001- item 2.9 – Maintenance of standards (and other ISO deliverables), which establishes a maximum period of 5 years for standards revision. The CERFLOR standards are periodically reviewed (5 years period) in the light of new scientific knowledge and practical experience as continuous improvement, as well as in line with PEFC requirements revisions.

The ABNT WG is responsible for initiating the revision work and the review process is similar to the process of setting a new standard.

Transparency and Consultation

The whole revision process was communicated to public and documented fulfilling the PEFC Council requirements on transparency.

National consultation was carried out as a part of standard revision process. All relevant parties were invited to participate in consultation through national consultation organized on-line through ABNT website. The invited parties represented environmental, economic and social interest groups.

The background studies and views, collected from the public consultation, formed the basis for the final discussions on the standard revision. During the national public consultation the standard revision forum received 4 comments for the planted forests standard and 2 comments for the CoC standard from participating organizations and individual persons none of them presenting any objections on the standard.

The rules and practical revision process of the CERFLOR Standards mainly comply with the PEFC Council requirements for standard setting. **The only non-conformity issue is length of the consultation period for the Standard for Native Forest. No changes were made in the standard and as a consequence the national consultation period was only 30 days which is not fully in compliance with PEFC requirements.** According to the applicant the consultation period for the Standard for Native Forest was 30 days because the CEE/ABNT has this procedure to reduce the time of public consultation in case that CEE/ABNT does not receive any comments and requests to revise.

5.2 Consultant's conclusions

(1) Has the development of the certification standards been independent from the certification and accreditation process?

Conclusion 1 Documentation

Documentation conforms to the PEFC requirements

CONMETRO resolutions (Annexes 1-3) designate ABNT as the National Forum for Standardization and establish and regulate INMETRO accreditation procedures for sectoral standardization.

Conclusion 1 Practice

Practice conforms to the PEFC requirements



Indufor

The revision process was carried out independent from certification bodies. INMETRO (the accreditation body) participated as a member in the standard setting working group but had no leading role in the process (Minutes of the WG meetings, Annex 26).

- (6) Have all relevant interested parties representing the different aspects of sustainable forest management been invited to participate in the standard setting process and a created Forum?**

Conclusion 2 Documentation

Documentation conforms to the PEFC requirements

ABNT administrative instructions are applicable in CERFLOR development and revision procedures (Annexes 9 & 10). They require that relevant interested parties representing all different aspects of sustainable forest management (producer, consumer and neutral parties) shall be invited into standard setting process and that they are fairly and equally represented.

Conclusion 2 Practice

Practice conforms to the PEFC requirements

According to the list of invited stakeholders as well as the stakeholder consultation prove that all relevant stakeholder groups were invited in the standard setting and revision processes (Annex 11). Stakeholder consultations also confirm that the standard development process is seen transparent and stakeholder groups are well represented. Although some invited interest groups, representing especially the social interests, chose not to participate various interests were adequately represented in standard setting forum.

However, to maintain active participation and consultation the consultant recommends that e-mailing list and other lists of stakeholders would be updated frequently.

- (7) Do consensus-building procedures of the Forum provide for balanced representation of interest categories?**

Conclusion 3 Documentation

Documentation conforms to the PEFC requirements

Standard Setting Working Group (WG) consists of producer, consumer and neutral party representatives (Annex 10; 8.1, 8.2 & 11) and different interest groups must be present in any decision making (Annex 10: 11.6).

Conclusion 3 Practice

Practice conforms to the PEFC requirements

According to the meeting minutes of the Standard Setting WG, the parties represented the interests of the forest owners, forest industries, trade unions and environmental organizations. The procedures provided balanced representation of the different interest categories.

- (8) Have the views of all relevant interested parties been documented and considered in an open and transparent way?**

Conclusion 4 Documentation

Documentation conforms to the PEFC requirements

In addition to the WG consensus building procedures, Annex 10; 13.6-13.10 requires that the National Consultation will be open and transparent and that all comment and suggestions are thoroughly considered. The procedures to address differing views in the standard setting process are described in Annex 10; paragraph 11.

Conclusion 4 Practice

Practice conforms to the PEFC requirements

Summary of Meeting Minutes prove that all the differing views have been documented and considered in an open and transparent way. Compilation of votes and comments (Annex 13) show that views of all relevant interested parties have been documented and considered.

(9) Has the formal approval of standards been based on evidence of consensus?

Conclusion 5 Documentation

Documentation conforms to the PEFC requirements

The national voting (consultation) system is described in detail in Annex 14. Standard Setting WG (CE) will analyze and take into consideration the national voting before final approval of the standard. The rules for voting and decision making (Annex 10; paragraph 11) in Study Commission strive for consensus. If unanimity is not achieved then 75% majority of attending members' votes is needed for a decision.

Conclusion 5 Practice

Practice conforms to the PEFC requirements

During the standard development and revision process the procedures described in the documentation were followed and all decisions were taken in consensus as proved in the summary of meeting minutes and in the minutes of the Technical Committee meetings (20/03/2009 & 6/12/2007).

(10) Does the implementation of the consensus based approach comply with Guideline GL 5/2006?

Conclusion 6 Documentation

Documentation conforms to the PEFC requirements

The consensus based approach of CERFLOR complies with PEFC Guideline 5/2006 as described in Study Commission internal rules (Annex 10; 11.3; 11.4; 11.6). National consultation (Annex 14; 5.2) is also a part of consensus building aiming to achieve consensus.

Conclusion 6 Practice

Practice conforms to the PEFC requirements

The procedures described in the documentation have been followed in standard development process (based on provided meeting minutes summaries and national voting process description).

(11) Has the Forum defined its own written procedures which have been made available to interest parties upon request?

Conclusion 7 Documentation

Documentation conforms to the PEFC requirements

Annex 14 (Administrative Instruction Manual, code 07.20.02. – Elaboration of Brazilian Standards) describes in detail the process and procedures for standard development and Annex 10 (Administrative Instruction Manual, code 07.20.07) Study Commission Internal Rules.

Conclusion 7 Practice

Practice conforms to the PEFC requirements



Indufor

Administrative manuals are available at CERFLOR/INMETRO website. Stakeholder consultation statements also prove that information on the standard setting process related documentation has been made easily available.

(12) Do the written procedures for standard setting contain an appeal mechanism for impartial handling of any substantive and procedural complaints?

Conclusion 8 Documentation

Documentation conforms to the PEFC requirements

Procedures describe a three level appeals mechanism for substantive and procedural complaints.

The application documentation describes in Annex 14 (Administrative Instructions Manual 5.5.2.2-5.5.2.5) procedures for substantial complaints that any interested party may request issuing a technically justified amendment in the standard.

Annex 27 (Conmetro Resolution No.04/03) describes establishment of a permanent appeals commission which is responsible for standard setting related appeals and complaints.

Conclusion 8 Practice

Practice conforms to the PEFC requirements

The appeals mechanism is in place but has not been used so far in the case of CERFLOR system.

(13) Has the start of the standard setting process been communicated to the public?

Conclusion 9 Documentation

Documentation conforms to the PEFC requirements

Annex 9: 5.5.1.2 – obliges the Study Commission (Standard Setting Working Group) Secretary to send forth to the required contacts of feasible participants a formal invitation letter.

Conclusion 9 Practice

Practice conforms to the PEFC requirements

The creation or reactivation of the Study Commission for the development or revision of standards is reported on the home page of ABNT and e-mail information letter has been sent to interested parties (e-mailing list was attached as an Annex in the application, further evidence has been received through the stakeholder consultation carried out for this assessment).

(14) Has the information on the development process been distributed and discussed?

Conclusion 10 Documentation

Documentation conforms to the PEFC requirements

Annex 14 (Administrative Instruction Manual, code 07.20.02. – Elaboration of Brazilian Standards) describes procedures for national consultation and Annex 10 (Administrative Instruction Manual, code 07.20.07 Study Commission Internal Rules) obliges the Study Commission, through its secretary, to carry out the national consultation.

Expression

Conclusion 10 Practice

Practice conforms to the PEFC requirements



Indufor

ABNT's standards were discussed in a few meetings and distributed to members of the Study Commission. Subsequently, the standards were submitted to a process of national consultation in the ABNT's website for vote and comment for a period of 60 days, as well as an announcement about these consultations were published in the national newspaper. (**Note consultation period for standard for natural forests was 30 days**).

After that, the result of the national consultation and the comments received were analyzed and discussed by the members of the ABNT's Study Commission and the decision to incorporate these comments was taken by consensus. (Annexes 11 & 12).

(15) Has the final draft standard been available to all interested parties, e.g. by posting it on the Internet?

Conclusion 11 Documentation

Documentation conforms to the PEFC requirements

Annex 14: 5.2.1 All Standard Projects, Standard Review Projects and Amendment Projects shall be submitted to National Voting. National voting will gather perceptions of all interested parties before the final adjustments and approval of the standard.

Conclusion 11 Practice

Practice conforms to the PEFC requirements

During the initial standard development and standard revision final standard drafts have been available for interested parties through the national voting process. The draft standards were made available through the ABNT website, as well as an announcement about these consultations were published in Federal Gazette.

(16) Has the final draft standard been sent out for formal national consultation process?

Conclusion 12 Documentation

Documentation conforms to the PEFC requirements

ABNT Administrative Instructions Manual (Annex 14: 5.2.1) require that all Standard Projects, Standard Review Projects and Amendment Projects shall be submitted to National voting before their final approval.

Conclusion 12 Practice

Practice conforms to the PEFC requirements

ABNT NBR 15789 (Forest management – Principles, criteria and indicators for native forests) were submitted to a process of national consultation for vote and comment for a period of 30 days through announcement no. 1/2008 (Annex 20) and no. 7/2009 (Annex 21) respectively, as well as an announcement about this consultation was published in a national news paper ("Diário Oficial da União-DOU") and ABNT's Newsletter.

The revision of the standards for planted forests and Chain of custody were submitted to a process of national consultation in the ABNT's web site in August 2007 (Annex 18), and for standard of native forests in July 2008 (Annex 21), as well as an announcement about this consultation was published in Federal Gazette.

(17) Have views of interested parties been discussed?

Conclusion 13 Documentation

Documentation conforms to the PEFC requirements

The national voting (consultation) system is described in detail in Annex 14 (5.2; 5.2.4). Study Commission (CE) will carefully analyze and take into consideration the national voting before final approval of the standard.

Conclusion 13 Practice

Practice conforms to the PEFC requirements

After national consultation, the result and the comments received were analyzed by the members of the ABNT's Study Commission. The comments considered relevant were incorporated in the standard (Annex 12).

The standards ABNT NBR 14791 (Guidelines for forest auditing – General principles) and ABNT NBR 14792 (Guidelines for forest auditing – Audit procedures – Auditing of forest management systems) were cancelled and replaced with ABNT NBR ISO 19011 (Guidelines for quality and/or environmental management systems auditing) (Annex 19). The confirmation's proposed of ABNT NBR 14793 (Guidelines for forest auditing – Qualification criteria for forest auditors) and ABNT NBR 15789 (Forest management – Principles, criteria and indicators for native forest) were submitted to a process of national consultation for vote and comment for a period of 30 days through announcement no. 1/2008 (Annex 20) and no. 7/2009 (Annex 21) respectively, as well as an announcement about this consultation was published in Federal Gazette ("Diário Oficial da União-DOU") and ABNT's Newsletter. As these confirmation's proposals had not received any technical objections, the ABNT NBR 14793 and 15789 were confirmed in 25/02/2008 (Annex 22) and 24/07/2009 (Annex 6), respectively.

The standards ABNT NBR 16789 (Forest Management — Guidance for the implementation of ABNT NBR 14789) and ABNT NBR 15753 (Forest Management — Guidance for the implementation of ABNT NBR 15789) were submitted to a process of national consultation for 60 days through the Announcement no. 06/2009 (Annex 23). The standard ABNT NBR 15753 was published in 14/08/2009 (Annex 8), and the comments received to ABNT NBR 16789 (Annex 7) were analyzed by the members of the ABNT's Study Commission.

(18) Has the Forum given general information on the changes made as a result of a consultation process?

Conclusion 14 Documentation

Documentation conforms to the PEFC requirements

Annex 14:5.2 describes the national voting process: if as a result of the first consultation there are technical objections approved in the Study Commission (CE), the second draft standard will also be sent out for national consultation. In case of an amendment made in CERFLOR standard, the ABNT Secretary will publish and forward an amendment as described in Annex 14:5.5.2.9.

Conclusion 14 Practice

Practice conforms to the PEFC requirements

The changes resulting from the national voting are documented through changes made in the second draft document which has been also sent out for public consultation.

The changes made as a result of national consultation in the case of the confirmation's proposed of ABNT NBR 14793 (Guidelines for forest auditing –



Indufor

Qualification criteria for forest auditors) and ABNT NBR 15789 (Forest management – Principles, criteria and indicators for native forest) were submitted to a process of national consultation for vote and comment for a period of 30 days. As these confirmation's proposals not received technical objections, the ABNT NBR 14793 and 15789 were confirmed in 25/02/2008 (Annex 22) and 24/07/2009 (Annex 6), respectively.

The standards ABNT NBR 16789 (Forest Management — Guidance for the implementation of ABNT NBR 14789) and ABNT NBR 15753 (Forest Management — Guidance for the implementation of ABNT NBR 15789) were submitted to a process of national consultation for 60 days through Announcement no. 06/2009 (Annex 23). The standards ABNT NBR 15753 was published in 2009/08/14 (Annex 8), and the comments received to ABNT NBR 16789 (Annex 7) are in analyses by the members of the ABNT's Study Commission.

(19) Had the consultation been at least 60 days?

Conclusion 15 Documentation

Documentation conforms to the PEFC requirements

Annex 14: 5.2.3 requires that the consultation period is at least 60 days.

Conclusion 15 Practice

Practice does not conform to the PEFC requirements

Standard for Planted Forests and CoC Standard: Consultation period was at least 60 days (Standard for Planted Forests: 21 July-8 October 2007; Standard for CoC; 21 July-15 October 2007).

Standard for Native Forests: In the case of the Standard for Native Forests consultation period has been 30 days (21 June – 23 July 2009). According to INMETRO this shortened period was justified as the standard included no changes made in the revision but was only a confirmation consultation. General ABNT procedure is to reduce public consultation period in case that the Technical Committee receives no comments or revision requests.

Comment: Consultant highly recommends that 60 days rule would be applied in all consultations without exceptions. Even though there were no changes made in the standard, especially possible new stakeholders need sufficient time to analyze and comment the standard.

(20) Has the development of certification standards been independent from the certification and accreditation process?

Conclusion 16 Documentation and Practice

Documentation and practice conform to the PEFC requirements

CONMETRO resolutions (Annexes 1-3) designate ABNT as the National Forum for Standardization and establish and regulate INMETRO accreditation procedures for sectoral standardization. Accordingly, the PEFCC are responsible for standard development whilst INMETRO is responsible for accreditation procedures in Brazil.

Concerning the Chain of Custody standard ABNT adopted the PEFC Technical Documentation - Annex 4 (*Chain of Custody of Forest Based Products – Requirements*) as part of CERFLOR Scheme – NBR14790.



Indufor

- (35) Have the first results on the testing of the final drafts for national/sub-national forest certification standards and their implementation arrangements been available prior to submission of the scheme for the PEFC Council endorsement and mutual recognition?**

Conclusion 17 Documentation

Not applicable. Not relevant requirement in standard revisions, because testing requirement can be met with the experience gained from the implementation of the previous standard.

Conclusion 17 Practice

Not applicable. Not relevant requirement in standard revisions, because testing requirement can be met with the experience gained from the implementation of the previous standard.

- (36) Has appropriate action been taken to incorporate improvements and recommendations prior to submission of the scheme for the PEFC Council endorsement and mutual recognition process?**

Conclusion 18 Documentation

Not applicable.

Not relevant requirement in standard revisions, because testing requirement can be met with the experience gained from the implementation of the previous standard.

Conclusion 18 Practice

Not applicable.

The CERFLOR standards are periodically reviewed in the light of new scientific knowledge and practical experience as continuous improvement. Standard revision will also take into account revisions made to PEFC technical documentation and requirements.



Indufor

6. REQUIREMENTS FOR CERTIFICATION SCHEMES AND THEIR IMPLEMENTATION

6.1 Background

The PEFC Scheme in Brazil is based on laws and regulations that outline the scheme implementation, performance requirements as well as certification and accreditation procedures. The scheme includes both forest management and chain-of-custody (CoC) standards. The scheme has adopted ABNT NBR 14789 Forest management – Principles, criteria and indicators for planted forests and ABNT 15789 Forest Management - Principles, criteria, and indicators for native forests for forest management and PEFC international rules and requirements for CoC and notification. Administrative rules complement the CoC standard by specifying procedures for conformity assessment and qualification requirements for auditors. The certification scheme can be implemented on two levels; individual and group certification.

6.2 Consultant's conclusions

- (1) Are the criteria relevant to all types of forests and management systems, which exist in the nation/region they have been elaborated for?**

Conclusion 19

Documentation conforms to the PEFC requirements

CERFLOR system includes standards for planted forests and for native forests (Annexes 5 & 6). They are applicable in different types of native or planted forests.

- (2) Do the criteria clearly express the objectives for forest management that can be unambiguously verified by different auditors?**

Conclusion 20

Documentation conforms to the PEFC requirements

CERFLOR standards express objectives for native forest and plantation forest management through principles, criteria and indicators.

The criteria in the CERFLOR scheme are clearly expressed and can be verified in a reasonably unambiguous way. However, as a consequence of the national level standard setting for a vast geographical area, criteria and indicators for forest management are rather general. Because many of the requirements are met through legal compliance, the relevant legislation should be referred to in the context of standard requirement. More detailed indicators and e.g. water management issues should be developed during the following standard revision to fully comply with the requirements of ITTO guidelines.

- (3) Are management and performance requirements applicable at the level of a forest management unit?**

Conclusion 21

Documentation conforms to the PEFC requirements

Requirements are applicable at forest management unit (FMU) or area level or the whole are of a forest producer group.

Annex 4: 8.1 The certification aims at indicating the existence of adequate levels of trust that one unit or area of management of forest or forest producer group is in compliance to the NBR 14789 (Principles, criteria and indicators for planted forest) or to the NBR 15789 (Principles, criteria and indicators for native forests).

- (4) **Are management and performance requirements applicable optionally also at group and regional levels?**

Conclusion 22

Documentation conforms to the PEFC requirements

The NIT – Dicor 053 (Additional Criteria for Forest Management Certification Body) – Annex A (in Annex 4) specifically deals with the certification of a group of forest owners.

CERFLOR does not contain specific requirements for regional certification; all of the requirements are applicable at a national level.

- (8) **Are the national certification criteria in compliance with national laws programmes and policies?**

Conclusion 23

Documentation conforms to the PEFC requirements

CERFLOR standards require compliance with current Federal, State and Municipal legislation. The Brazilian Government, through the MDIC and the MMA, has supported the development of a national forest certification program.

- (9) **Are the references to national laws, programs and policies indicated in the scheme documentation when relevant, e.g., if the requirement of the PEOLG is not addressed in the certification criteria but is included in normative regulations?**

Conclusion 24

Documentation conforms to the PEFC requirements

Indirect, general references to relevant legislation are made in the cases where CERFLOR does not specifically set the requirement.

ABNT NBR 14789 - Principle 1 (Annex 5) 3.1.1 Criterion 1.1 and ABNT NBR 15789 - Principle 1 (Annex 6) 4.1.1 Criterion 1.1 require that the forest manager has mechanism to identify applicable laws and regulations.

- (10) **Does the scheme include the requirement that any apparent violation of the legislation shall be taken into consideration in internal and external audits?**

Conclusion 25

Documentation conforms to the PEFC requirements

ABNT NBR 14789 - Principle 1 (Annex 5) 3.1.1 Criterion 1.1 and ABNT NBR 15789 - Principle 1 (Annex 6) 4.1.1 Criterion 1.1 require existing mechanism to identify applicable laws and regulations and also **require proofs** of fulfillment of such laws.

The standard explicitly requires conformity to legislation and requires audit evidence on the conformance. Thus any violation to legislation will be addressed in the certification audits.



Indufor

- (11) **Are the Fundamental ILO Conventions ratified by the country and implemented through the legislative framework?**

Conclusion 26

Documentation conforms to the PEFC requirements

Brazil has already ratified the fundamental International Labor Organization (ILO) Conventions and implemented them through the legislative framework. Ratified ILO conventions are presented in the Table 6.1.

Table 6.1 Ratification of the Core ILO and Other Relevant Conventions

Convention	Year of ratification
ILO 29 Forced Labour, 1930	25.04.1957
ILO 87 Freedom of Associations and Protection of Right to Organize, 1948	Not ratified ¹
ILO 98 Right to Organize Collective Bargaining, 1949	18.11.1952
ILO 100 Equal Remuneration, 1951	25.04.1957
ILO 105 Abolition of Forced Labour, 1957	18.06.1965
ILO 111 Discrimination (Employment and Occupation), 1958	26.11.1965
ILO 138 Minimum Age for Admission to Employment, 1973	28.06.2001
Convention on Biological Diversity, 1992	28.02.1994
CITES, 1973	06.08.1975
Biosafety Protocol, 2000	24.11.2003

- (12) **Do the national certification criteria address the core elements of those Fundamental ILO Conventions, which have been not ratified by the country?**

Conclusion 27

Documentation partly conforms to the PEFC requirements

Brazil has ratified all the fundamental ILO conventions mentioned in the requirements except ILO 87. All of these are implemented through the legislative framework.

- (16) **Are the applicants, the certified areas and participating forest owners/managers/ others actors clearly identified in the scheme documentation?**

Conclusion 28

Documentation conforms to the PEFC requirements

Annex 4 (NIT-DICOR-053: 9.4.6 and Annex A & B) guides identification of certified area and participating owners. The document sets “Additional Criteria for Forest Management Certification Body” in qualifying the applicants. The scheme does not directly specify applicant.

- (17) **Does the scheme documentation require that all actors involved in or operating on the certified area comply with the certification requirements?**

Conclusion 29

Documentation conforms to the PEFC requirements

All forest producers must individually comply with certification requirements. Requirements apply to all actors involved in forest management activities.

¹ According to ILOLEX Brazil has not ratified ILO 87 Convention



Indufor

Annex 4 (Annex A: A-1 and A-2) requires that in group certification all forest producers must individually comply with certification requirements.

The NIT – Dicor 053 – item 9.4.1, (Annex 4) establishes that the organizations must have a descriptive document presenting what has been done to satisfy the Brazilian standards ABNT NBR 14789 (Annex 5) and ABNT NBR 15789 (Annex 6) and the commitments have been made for satisfying certification. This is extended to all players involved in the management of the areas to be certified.

NIT-Dicor 053 – Annex A, item A-5 (Annex 4) states that the forest producer group is responsible for applying and monitoring the requirements established in the standard, and is responsible for establishing procedures that ensure that every participant of the certified group fill in and execute their duties, and for informing the participants and the interested parties about their rights and obligations before the certification.

- (18) Does the scheme documentation require that all actors individually certified or participating in regional/group certification are responsible for ensuring that contractors' activities and operations meet the respective forest management criteria?**

Conclusion 30

Documentation conforms to the PEFC requirements

Both of CERFLOR forest management standards require in their Principle 2 that “*The organisation shall show and present attitudes that lead to the sustainable use of resources and services offered by the forest*”.

The NIT – Dicor 053 – item 9.4.1, (Annex 4) establishes that the organizations must have a descriptive document presenting what has been done to satisfy the Brazilian standards ABNT NBR 14789 (Standard for Planted Forests, Annex 5) and ABNT NBR 15789 (Standard for Native Forests, Annex 6) and the commitments have been made for satisfying certification. This is extended to all actors involved in the management of the areas to be certified.

Comment: this may be an issue of translation but it is recommended that during the next scheme revision this requirement would be more clearly expressed in the forest management standard documents.

Conclusion 31

Questions 19-34 on regional certification are not relevant in CERFLOR Scheme.
The scheme includes only individual and group certification.

- (36) Does the scheme documentation clearly define who the applicant is for group certification?**

Conclusion 32

Documentation conforms to the PEFC requirements

Scheme documentation defines the applicant for group certification but the definition is given in NIT-Dicor 053 – Annex A, item A-1. (Annex 4 “Additional criteria for forest management certification body on compliance to NBR 14789 and/or the NBR 15789”).

NIT-Dicor 053 document sets “Additional Criteria for Forest Management Certification Body”. The forest management and CoC standards or their implementation guidelines do not directly specify the applicant. Applicant description (entity which can apply in the name of the group) should be stated in the standard documents itself. Now the description is in a document which is part of the scheme documentation but which is



Indufor

not very logical place (according to the title it gives instructions to a CB). The consultant recommends that this requirement would be given in the Forest Management Standards as well.

- (37) Does the scheme documentation describe the applicant's responsibility to assure the compliance of all participants with the certification requirements?**

Conclusion 33

Documentation conforms to the PEFC requirements

NIT-Dicor 053 – Annex A, item A-5 (Annex 4) states that the forest producer group is responsible for applying and monitoring the requirements established in the standard, as well as being responsible for establishing procedures that ensure that every participant of the certified group fill in and execute their duties, and for informing the participants and the interested parties about their rights and obligations before the certification.

- (38) Does the scheme documentation describe the applicant's responsibility to ensure that credible registers are kept of participants to certification and certified forest area?**

Conclusion 34

Documentation conforms to the PEFC requirements

NIT-Dicor 053 – Annex A, item A-2 (Annex 4) requires that the forest producer group will keep forest area records, including owner and forest management unit or area identification under certified forest management state; and immediately inform the certification body of inclusion or exclusion of any member.

- (39) Does the scheme documentation describe the applicant's responsibility to implement the rules for group certification?**

Conclusion 35

Documentation conforms to the PEFC requirements

NIT-Dicor 053 – Annex A, item A-5 (Annex 4). The responsibility is described in the documentation.

The forest producer group is responsible for informing the participants and the interested parties about their rights and obligations before the certification and for clearly describing the responsibility sharing among forest producer group and its members. The forest producer groups shall also demonstrate that the responsibility towards the implementation of the NBR 14789 or the NBR 15789 was discussed among all forest producer group members.

- (40) Does the scheme documentation require that total forest area participating in group certification is recorded?**

Conclusion 36

Documentation conforms to the PEFC requirements

NIT-Dicor 053 – Annex A, item A-1 & A-2 (Annex 4), the total area certified under the certificates shall be recorded.

The applicant must be the entity incorporated under the law and a single certification must be issued on behalf of this group, identifying every forest management unit or area.



Indufor

- (42) Does the scheme documentation define the responsibilities and authorities of the applicant and participating forest owners/managers for the inclusion of new participants and to inform the certification body thereof?**

Conclusion 37

Documentation conforms to the PEFC requirements

The scheme documentation describes clearly the responsibilities of different parties for the inclusion of new participants.

NIT-Dicor 053 - 8.1 and Annex A, item A-5 (Annex 4)

The forest producer group is responsible for:

- e) informing the certification body with a signed agreement of a new member of any changes occurring in the forest producer group through ownership changes;
- f) clearly describe the responsibility sharing among forest producer group and its members;
- g) demonstrate that the responsibility towards the implementation of the NBR 14789 or the NBR 15789 was discussed among all forest producer group members.

- (43) Does the scheme documentation define the responsibilities and authorities of the applicant and participating forest owners/managers for the internal control of conformity and follow up corrective and/or preventive measures?**

Conclusion 38

Documentation conforms to the PEFC requirements

Responsibilities and authorities for internal control and follow up corrective/preventive measures are clearly defined in the scheme documentation.

NIT-Dicor 053 – Annex A – A-5 (Annex 4).

A-5 The forest producer group is responsible for applying and monitoring the requirements established in the NBR 14789 or the NBR 15789, as well as:

- a) establish procedures that ensure that every participant of the certified group fill in and execute their duties, by taking into account the requirements established in the NBR 14789 or in the NBR 15789;
- b) inform the participants and the interested parties about their rights and obligations before the certification;
- g) demonstrate that the responsibility towards the implementation of the NBR 14789 or the NBR 15789 was discussed among all forest producer group members.

- (44) Does the scheme documentation describe that the forest management certificate is issued to the applicant (certificate holder)?**

Conclusion 39

Documentation conforms to the PEFC requirements

NIT-Dicor 053 – Annex A., A-2. (Annex 4), The applicant (individual or a forest producer group) will represent the certified unit and the certificate shall be issued to the applicant.

NIT-Dicor 053 – Annex A., A-2. (Annex 4): Every forest producer group must meet the certification requirements individually. A single certification must be issued on behalf of this group, identifying every forest management unit or area belonging to individuals



Indufor

or organizations. Certifications copies shall be provided for the group members by OCF.

- (45) **Does the scheme documentation describe that participants in group certification shall receive either a copy of the group certificate including the appendix (when applicable) listing all participating forest owners or an individual attestation issued by the certification body or the applicant which refers to the main certificate?**

Conclusion 40

Documentation conforms to the PEFC requirements

NIT-Dicor 053 – Annex A., A-2. (Annex 4): Certifications copies may be provided for the group members by OCF (certification body).

The appendix listing all participating forest owners is not required in the documentation. NIT-Dicor 053 – Annex A., A-5. (Annex 4) states that the certificate holder must keep forest area records, including owner and forest management unit or area identification under certified forest management state.

- (46) **Does the scheme documentation describe that forest owner should submit all the forest area under his management in the catchment area of the certification scheme in the certification? (*not obligatory to be met but should be aimed at*)**

Conclusion 41

Documentation conforms to the PEFC requirements

NIT-Dicor 053 - 8.1 (Annex 4): The certification aims at indicating the existence of adequate levels of trust that **one forest management unit or area** or forest producer group is in compliance to the NBR 14789 or to the NBR 15789.

- (47) **Does the scheme documentation define transition period(s) for implementation of changes to the endorsed scheme in compliance with chapter 5 of Annex 3. (*This is not applicable to the initial endorsement of a scheme*)**

Conclusion 42

Documentation conforms to the PEFC requirements

Transition period is regulated by ABNT NBR ISO/IEC 17021; item 8.6.2. and shall not exceed 12 months.

- (48) **Has the PEFC National Governing Body set up or appointed an impartial and independent dispute settlement body on a permanent basis or does it have written procedures for the establishment of a dispute settlement body on an ad hoc basis?**

Conclusion 43

Documentation conforms to the PEFC requirements

CONMETRO Resolution No. 04/03, of 12/10/03 (Annex 27) describes procedures for appeals mechanisms establishment which are also applicable to INMETRO, the CERFLOR national governing body. These procedures conform to the PEFC requirements.

Expression

As part of the Brazilian Conformity Assessment System - SBAC, CERFLOR uses its permanent structure for its different levels of activity (1st, 2nd and 3rd levels) to deal with complaints and appeals, which are established in CONMETRO Resolution No.



Indufor

04/03, of 12/10/03 (Annex 27). Mechanism includes CONMETRO permanent appeals commission.

Besides the above, the System - SBAC contains procedures based upon ISO 17021, ISO Guide 65 and internal standard NIE-Cgcre 006 (Annex 28), which furthermore establishes that the Certification Bodies must have procedures to resolve conflicts.

- (49) Has the PEFC National Governing Body established and have documented procedures for an independent dispute settlement body, either permanent or ad hoc, that takes care of those complaints arising from forest management or chain of custody scheme implementation that cannot be addressed in the dispute settlement procedures of the relevant certification or accreditation body?**

Conclusion 44

Documentation conforms to the PEFC requirements

INMETRO has documented procedures for a permanent dispute settlement body.

As part of the Brazilian Conformity Assessment System - SBAC, CERFLOR uses SBAC mechanisms for resolving conflicts. Conflict which cannot be solved by AB will be moved to the Quality Board or INMETRO's General Accrediting Board, hence to the INMETRO Office of the President and finally the INMETRO Permanent Appeals Commission.

7. PERFORMANCE REQUIREMENTS / ITTO GUIDELINES

7.1 Compatibility with ITTO guidelines for management of plantation forests (Part V)

The CERFLOR Standards cover all aspects of sustainable forest management as defined relevant by the CERFLOR stakeholder group. The standards are applicable to all types of forests throughout the country. The focus in the standards is on forest management unit level operations.

The certification criteria used in the CERFLOR scheme is based on ITTO Guidelines on the sustainable forest management of tropical forests. As part of the revision process, all of the elements of ITTO Guidelines were compared to the standard in order to make sure the revised standard meet the PEFC requirements.

General description on the results of the conformity assessment of the CERFLOR standards for natural forests and planted tropical forests is given in Table 7.2. The scale used in deciding on the conformance level is presented in the Table 7.1.

A full conformity of one or several standard requirements with the ITTO guideline is required for a positive conclusion on compliance. The grade “partial conformity” is used to provide information that some standard elements are in line with the ITTO requirements but their scope or performance level is not adequate. The grade “non conformity” describes the situation where the standard does not address the required element at all or its performance level is far from the required one.

On the balance of a substantial number of requirements demonstrating conformity, a small number with partial conformity and 2 identified non-conformities for which specific action is required, the standards set the performance and system requirements for certification of forest management that comply with the expectations of the ITTO and PEFC.

Detailed analysis and description on the conforming elements of the CERFLOR standards are presented in Annex 2 to this report.

Table 7.1 Scale of assessment

Conforms	Standard requirement conforms to ITTO requirement
Partial conformity	Standard requirement conforms to some elements of the requirement or to all elements but not in a fully satisfactory level
Non conformity	Standard requirement practice does not conform to the requirement.



Indufor

Table 7.2 Compliance of the CERFLOR (2010) standard with the ITTO guidelines and selected PEFC requirements

Natural Forests		
ITTO Guideline		Conformance of CERFLOR standard
Principle	Recommended action/requirement	Conformance level
National Forest Inventory	Principle 4	Conforms to ITTO Guideline
	Principle 5	Conforms to ITTO Guideline
Permanent Forest Estate	Principle 6	Conforms to ITTO Guideline
	Principle 7	Conforms to ITTO Guideline
	Possible action 7	Conforms to ITTO Guideline
	Principle 8	Conforms to ITTO Guideline
Forest management - general	Principle 11	Conforms to ITTO Guideline
Planning	Principle 12	Conforms to ITTO Guideline
Static and dynamic inventory	Principle 13	Conforms to ITTO Guideline
	Possible action 10	Conforms to ITTO Guideline
	Possible action 11	Partial conformity to ITTO Guideline
Setting of management objectives	Principle 14	Conforms to ITTO Guideline
	Principle 15	Conforms to ITTO Guideline
Choice for silvicultural concept	Principle 16	Conforms to ITTO Guideline
	Possible action 12	Conforms to ITTO Guideline
Yield regulation, Annual Allowable Cut	Principle 17	Conforms to ITTO Guideline
	Possible action 13	Conforms to ITTO Guideline
	Possible action 14	Conforms to ITTO Guideline
Management inventory and mapping	Principle 18	Conforms to ITTO Guideline
	Possible action 15	Conforms to ITTO Guideline
Preparation of working plans	Principle 19	Conforms to ITTO Guideline
	Possible action 16	Partial conformity to ITTO Guideline
Environmental Impact assessment	Principle 20	Conforms to ITTO Guideline
	Possible action 17	Conforms to ITTO Guideline
	Possible action 18	Conforms to ITTO Guideline
Harvesting (general)	Principle 21	Conforms to ITTO Guideline
Pre-harvest prescriptions	Principle 22	Conforms to ITTO Guideline
	Possible action 19	Conforms to ITTO Guideline
Roads	Principle 23	Conforms to ITTO Guideline
	Possible action 20	Conforms to ITTO Guideline
Extraction	Principle 24	Conforms to ITTO Guideline
	Possible action 21	Conforms to ITTO Guideline
Post-harvest management	Principle 25	Conforms to ITTO Guideline
	Possible action 22	Conforms to ITTO Guideline
Protection – control of access	Principle 26	Conforms to ITTO Guideline
	Possible action 23	Conforms to ITTO Guideline
Protection - fire	Principle 27	Conforms to ITTO Guideline
	Possible action 24	Conforms to ITTO Guideline
Protection - chemicals	Principle 28	Conforms to ITTO Guideline
	Possible action 25	Partial conformity to ITTO Guideline
Salvage permits	Principle 32	Conforms to ITTO Guideline
	Possible action 28	Partial conformity to ITTO Guideline
	Possible action 29	Conforms to ITTO Guideline
Monitoring and research (including yield control and silviculture)	Principle 3	Conforms to ITTO Guideline
	Possible action 30	Non conformity
	Possible action 31	Conforms to ITTO Guideline
	Possible action 32	Conforms to ITTO Guideline
Socio-economic and financial aspects (general)	Principle 34	Conforms to ITTO Guideline
	Principle 35	Conforms to ITTO Guideline
Relations with local populations	Principle 36	Conforms to ITTO Guideline
	Possible action 34	Conforms to ITTO Guideline
	Possible action 34	Conforms to ITTO Guideline



Indufor

Natural Forests		
ITTO Guideline		Conformance of CERFLOR standard
Economics, incentives, taxation	Principle 37	Conforms to ITTO Guideline
	Possible Action 35	Conforms to ITTO Guideline
	Principle 38	Partial conformity to ITTO Guideline
	Principle 39	Conforms to ITTO Guideline
	Principle 40	Conforms to ITTO Guideline
	Principle 41	Conforms to ITTO Guideline
	Possible action 36	Conforms to ITTO Guideline
Compatibility with ITTO guidelines on the conservation of biological diversity in tropical production forests (natural forests)		
Conservation of biodiversity at landscape level	Principle 4	Conforms to ITTO Guideline
	Rec. action 5:	Conforms to ITTO Guideline
	Principle 5	Conforms to ITTO Guideline
	Rec. action 6	Conforms to ITTO Guideline
	Principle 6	Conforms to ITTO Guideline
	Rec. action 7	Conforms to ITTO Guideline
Planning – choice of silvicultural concept	Principle 7	Conforms to ITTO Guideline
	Rec. action 8	Conforms to ITTO Guideline
	Rec. action 9	Conforms to ITTO Guideline
	Rec. action 10	Conforms to ITTO Guideline
Planning – yield regulation, annual allowable cut and rotation time	Principle 8:	Conforms to ITTO Guideline
	Rec. action 11	Conforms to ITTO Guideline
	Principle 9	Conforms to ITTO Guideline
	Rec. action 12	Conforms to ITTO Guideline
Planning –management inventory and mapping	Principle 10	Partial conformity to ITTO Guideline
	Rec. action 13	Conforms to ITTO Guideline
	Principle 11	Conforms to ITTO Guideline
	Rec. action 14	Conforms to ITTO Guideline
	Rec. action 15	Conforms to ITTO Guideline
Extraction	Principle 12	Conforms to ITTO Guideline
	Rec. action 16	Conforms to ITTO Guideline
	Rec. action 17	Conforms to ITTO Guideline
Implementation	Principle 13	Conforms to ITTO Guideline
	Rec. action 19	Conforms to ITTO Guideline
Research and monitoring	Principle 14	Conforms to ITTO Guideline
	Rec. action 20	Conforms to ITTO Guideline

Compatibility with ITTO guidelines for the establishment and sustainable management of planted forests		
Principle	Recommended action/requirement	Conformance level
Planted forests		
Permanent forest	Principle 10: maintenance of forest cover*	Partial conformity to ITTO Guideline
	Principle 11: consideration of local interests	Conforms to ITTO Guideline
	RA**8: Delineation of the land categories in consultation with local people	Conforms to ITTO Guideline
	Principle 12: Natural forests should not be cleared...	Conforms to ITTO Guideline
	Principle 13: Conversion of highly degraded land to forests	Conforms to ITTO Guideline
	RA 9: Monitoring and planning in consultation with communities	Partial conformity to ITTO Guideline
	Principle 15: Land tenure, dispute settlement	Conforms to ITTO Guideline
Environmental considerations	RA 13: Environmental impact assessment, pre-planting studies	Conforms to ITTO Guideline
	RA 14: Recognition of environmental restrictions	Conforms to ITTO Guideline
	RA 15: Land-use effects on biodiversity and climate.	Conforms to ITTO Guideline
	RA 16: Resource values and benefit sharing	Conforms to ITTO Guideline



Indufor

Compatibility with ITTO guidelines for the establishment and sustainable management of planted forests		
Principle	Recommended action/requirement	Conformance level
	RA17: Precautionary approach	Conforms to ITTO Guideline
Socio-economic considerations	RA 18: Socio-economic impact assessment, pre-planting study	Conforms to ITTO Guideline
	RA 19: Diversity of crop types to meet community demands	Non conformity
	RA 20: Market evaluations	Conforms to ITTO Guideline
Institutional considerations	Principle 24: Training	Conforms to ITTO Guideline
	Principle 25: Integration of NGOs in planning	Conforms to ITTO Guideline
	RA 21: Institutional strengthening and participation	Conforms to ITTO Guideline
Planted forests - management plan	RA 22: Adequate management planning	Conforms to ITTO Guideline
	RA 23: Issues to be included in plan	Conforms to ITTO Guideline
	Principle 27: Multi-purpose plan	Conforms to ITTO Guideline
	RA 25: Site mapping, risk analysis	Conforms to ITTO Guideline
	RA 26: Soil quality and activity	Conforms to ITTO Guideline
	RA 27: Minimize soil exposure	Conforms to ITTO Guideline
	RA 28: Maintain soil cover	Conforms to ITTO Guideline
	RA 29: Avoid soil erosion and compaction	Conforms to ITTO Guideline
	RA 30: Auxiliary vegetation	Conforms to ITTO Guideline
RA 31, 46:	Conforms to ITTO Guideline	
Planning - research needs	RA 32: Improve information on decision making	Conforms to ITTO Guideline
Site selection	RA 33: Soil and site survey	Conforms to ITTO Guideline
	RA 34: Preference to native species	Conforms to ITTO Guideline
	RA 35: Research on native species	Partial conformity to ITTO Guideline
	RA 36: Selection of suitable species, species mix	Conforms to ITTO Guideline
Roads, site protection	RA 37: Road design, controlled use	Conforms to ITTO Guideline
	RA 38: Prevent soil disturbance, erosion in road construction	Conforms to ITTO Guideline
	RA 39: Fire management	Conforms to ITTO Guideline
Site preparation	RA 40: Land capability assessments	Conforms to ITTO Guideline
	RA 41: Capabilities to carry out soil conservation	Conforms to ITTO Guideline
Planting	RA 42: Appropriate technique	Conforms to ITTO Guideline
Fertilization	RA 43: Fertilization based on soil qualities, prevention of leaching	Conforms to ITTO Guideline
	RA 44: Fertilization program	Conforms to ITTO Guideline
	RA 45: Integrated fertilization schedule	Conforms to ITTO Guideline
Tending	RA 46: Tending and weeding	Partial conformity to ITTO Guideline
Pest control, diseases	RA 47: Management measures to prevent pest and disease infections	Conforms to ITTO Guideline
	RA 48: Forest hygiene practices	Conforms to ITTO Guideline
	RA 49: Diversity to improve health in forests	Conforms to ITTO Guideline
	RA 50: Biological pest and disease management	Conforms to ITTO Guideline
Staff development	RA 51: Motivation development	Conforms to ITTO Guideline
Institutional considerations	RA 53: Funding	Partial conformity to ITTO Guideline
	RA 54: Training	Conforms to ITTO Guideline
Social consideration	RA 55: Social impact analysis	Conforms to ITTO Guideline
Economic considerations	RA 56: Data on costs and benefits	Conforms to ITTO Guideline
	RA 57: Market studies	Conforms to ITTO Guideline
	RA 58: Improved utilization of resources	Conforms to ITTO Guideline
Resource inventories	RA 59: strategic inventories	Conforms to ITTO Guideline
	RA 60: Permanent sample plots	Partial conformity to ITTO Guideline
	RA 61: Update of inventory summaries	Partial conformity to ITTO Guideline
	RA 62: Inventory methods, data management	Conforms to ITTO Guideline
Timber production	RA 63: Definition of allowable cut	Conforms to ITTO Guideline
	RA 64: Adaptation of harvesting according to	Conforms to ITTO Guideline



Indufor

Compatibility with ITTO guidelines for the establishment and sustainable management of planted forests		
Principle	Recommended action/requirement	Conformance level
	market situation	
Restoration,	RA 65-66	Conforms to ITTO Guideline
Tending	RA 67: Principles 30-32 and RA 27-31 addressed the issue	Conforms to ITTO Guideline
Thinning, pruning	RA 68: Thinning, pruning schedules, benefits	Conforms to ITTO Guideline
Rooding	RA 69: Road network plan	Conforms to ITTO Guideline
	RA 70: Construction methods, soil conservation	Conforms to ITTO Guideline
Protection -control of access	RA 71: Control of access, reduced pressure on encroachment	Partial conformity to ITTO Guideline
Fire protection	RA 72: Post establishment fire protection	Conforms to ITTO Guideline
Pest disease	RA 73: Management measures	Conforms to ITTO Guideline
	RA 74: Budget for fire management, standard operating procedures and instructions	Conforms to ITTO Guideline
Harvesting	RA 75: Replanting planning	Partial conformity to ITTO Guideline
Additional PEFC requirements for forest management of natural tropical forests		
PEOLG	2.2b	Conforms to PEOLG
PEOLG	4.2f	Conforms to PEOLG
PEOLG	4.2i	Conforms to PEOLG
PEOLG	6.1a	Conforms to PEOLG

* The short title of the principle/ recommended action is defined by the consultant. ** RA - recommended action

8. REQUIREMENTS FOR CERTIFICATION BODIES AND PROCEDURES

8.1 Background

National legislation and administrative rules regulate certification and accreditation procedures. Certification bodies carrying out certification to CERFLOR's standards shall be accredited by INMETRO.

The requirements and guidelines set for accreditation comply with the PEFC Council requirements. The normative accreditation requirements for forest certification and for chain of custody accreditation are presented in INMETRO Standards NIT-DICOR-053 and NIT-DICOR-024 respectively and are annexed to the INMETRO endorsement application.

The background for developing the standards NIT-DICOR-053 and NIT-DICOR-024 is the need to clearly define and communicate within the forest certification scheme specific requirements and guidelines for certification bodies that are accredited in accordance with ISO 17021 and ISO Guide 65. The documents guide the verification of conformity to the CERFLOR Standards and to the other scheme requirements.

Certification bodies operating PEFC certification in Brazil shall be notified by INMETRO through a contract signed between INMETRO and a certification body. In cases where the accreditation is done by another qualifying accreditation body the contract is signed by Dqual/INMETRO and certification body which ensures compliance with notification procedures.

8.2 Consultant's conclusions

- (1) Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?**

Conclusion 45

Documentation conforms to the PEFC requirements

The scheme documentation requires that the certification is carried out by impartial, independent third parties.

The standard setting process is governed by ABNT as a National Standardization body (Annex 1). Official accrediting agency is INMETRO. Impartiality and independence of certification bodies for forest management certification in the CERFLOR scheme are ensured through INMETRO NIT-Dicor 053 – ver.08, item 9.2 (Annex 4) and ISO 17021.

For certification of chain of custody, the certifying bodies within the CERFLOR scheme must be in accordance with the NIT-Dicor-024-ver.02, item 8.1 (Annex 29), and ISO Guide 65.

- (2) Does the scheme documentation require that certification body for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfill requirements defined in ISO 17021 or ISO Guide 65?**

Conclusion 46

Documentation conforms to the PEFC requirements

The scheme documentation requires that a CB for forest management fulfils the requirements of ISO 17021 and for chain of custody fulfils the requirements of ISO Guide 65.

In order to grant the impartiality and independence of certification of forest management, the CERFLOR's certifying bodies must be in accordance with the NIT-Dicor 053 – ver.08, item 9.2 (Annex 4) **and** ISO 17021; and for certification of the chain of custody, the CERFLOR's certifying bodies must be in accordance with the NIT-Dicor-024-ver.02, item 8.1 (Annex 29), and ISO Guide 65.

- (3) Does the scheme documentation require that certification body chain of custody certification against Annex 4 shall fulfill requirements defined in ISO Guide 65?**

Conclusion 47

Documentation conforms to the PEFC requirements

The CERFLORs certifying bodies for the CoC certification must fulfill the requirement of the NIT-Dicor-024-ver.02, item 8.1 (Annex 29), and ISO Guide 65.

- (4) 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?**

Conclusion 48

Documentation conforms to the PEFC requirements

The scheme documentation requires that a CB for forest management has the relevant technical competence. The CB's technical competence requirements are based on ISO 17021 standard requirements which are completed with more specific description of requirements for CBs and auditors in forest management certification according to CERFLOR standards.

CERFLOR's certifying bodies fulfils the requirements of NIT-Dicor 053 - ver.08, item 9.3 (Annex 4) and ISO 17021 and ABNT NBR 14793- Guidelines for Forest Auditing - Auditing procedures – Qualification Criteria for Forest Auditors (Annex 22).

- (5) Does the scheme documentation require that certification bodies carrying out C-o-C certifications shall have technical competence in forest based products procurement and processing and material flows in different stages of processing and trading?**

Conclusion 49

Documentation conforms to the PEFC requirements

The scheme documentation requires that CBs for CoC certification have the relevant technical competence as follows.

ABNT ISO/IEC Guidance 65:1997 requires technical competence.

In addition INMETRO Administrative Directive (Annex 30) requires that auditors and specialists of the CB meet the requirement of ISO 19011 and additional requirements given for auditors.



Indufor

- (6) **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?**

Conclusion 50

Documentation conforms to the PEFC requirements

CoC certification: The scheme documentation requires that CBs carrying out **CoC certification** have a good understanding of CERFLOR system. Annex 29 (Criteria for the Accreditation of Products Certification Bodies and Product Performance Certification) requires that the CB must fulfill the requirements of ISO Guide 65 for CoC certification ISO Guide 65 sets adequate competence requirements for CB.

Certification of forest management: Specific criteria for understanding of CERFLOR system are established for planted and native **forest management certification** bodies for certification carried out in compliance to NBR 14789 and the NBR 15789 (Additional Criteria for Forest Management Certification Body on Compliance to NBR 14789 and/or the NBR 15789, Annex 4). Forest management certification body auditors and experts must fulfill the ISO 19011 requirements and technical requirements given in Annex 4. Annex 4 also requires that the CB must fulfill the requirements of ISO 17021 ISO 17021 sets adequate competence requirements for CB.

- (7) **Does the scheme documentation require that certification bodies have the responsibility to use competent auditors who have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification?**

Conclusion 51

Documentation conforms to the PEFC requirements

The scheme documentation requires that the auditors have adequate technical know-how.

In the case of certification of forest management, the NIT-Dicor 053 (Annex 4), item 9.3 states that the forest management certification body auditors and experts must meet the requirements contained in the NBR ISO 19011 as well as the specific requirements contained in the NBR 14793. Additionally, ABNT NBR 14793 (Annex 22), establishes requirement that the certification bodies for Forest Management shall use competent auditors. For certification of the chain of custody, these responsibilities are described in the ISO/IEC 65 Guide and in the INMETRO Administrative Directive N°.369/09 - RAC, item 10.1, 10.2 and Annex C (Annex 30).

- (8) **Does the scheme documentation require that the auditors must fulfill the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?**

Conclusion 52

Documentation conforms to the PEFC requirements

The scheme documentation requires that the auditors must fulfill ISO 19011 requirements.

In the case of certification of forest management, the NIT-Dicor 053, item 9.3 (Annex 4), requires that the auditors must fulfill the ISO 19011. For certification of the chain of custody, these responsibilities are described in the INMETRO Administrative Directive N°. 369/09 - RAC, item 10.1.



Indufor

- (11) Does the scheme documentation require that applied certification procedures for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfill or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?**

Conclusion 53

Documentation conforms to the PEFC requirements

The scheme documentation requires that the CBs for forest management must comply with ISO 17021 and for CoC with ISO Guide 65.

CERFLOR requires in NIT – Dicor – 053, item 9.2 and 9.4.1 (Annex 4) that the Certification Bodies must comply with the ISO 17021, for certification of forest management and, for the certification of the chain of custody they must comply with the ISO/IEC 65 Guide (Annex 30: Directive no. 369/09 - RAC, 5.4 – “5.4 The Conformity Assessment Body (CAB) shall act in agreement with the requirements set forth in ABNT ISO IEC Guidance 65 in addition to those of this document.”).

- (12) Does the scheme documentation require that applied certification procedures for chain of custody certification against Annex 4 shall fulfill or be compatible with the requirements defined in ISO Guide 65?**

Conclusion 54

Documentation conforms to the PEFC requirements

The scheme documentation requires that the procedures are compatible with ISO Guide 65.

NIT-Dicor 024, item 8.1 (Annex 29): “The criteria adopted for certification body accreditation and product performance verification are established in the ABNT ISO/IEC Guia 65, in the NIT-DICOR-057, in the Use of the trademark, symbol and reference to the accreditation.”

- (13) Does the scheme documentation require that applied auditing procedures shall fulfill or be compatible with the requirements of ISO 19011?**

Conclusion 55

Documentation conforms to the PEFC requirements

Auditing procedures must be compatible with ISO 19011.

NIT Dicor 053, item 9.3 (Annex 4) and INMETRO Administrative Directive no. 369/09 - RAC, item 10.1 (Annex 30).

- (14) 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?**

Conclusion 56

Documentation conforms to the PEFC requirements

The scheme documentation requires that CB shall inform CERFLOR Secretary about all issued certificates and their changes.

NIT-Dicor 053 (Annex 4), item 9.4.9; INMETRO Administrative Directive no. 369/09 - RAC, item 6.1.5.8 (Annex 30).



Indufor

- (15) 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?**

Conclusion 57

Documentation conforms to the PEFC requirements

The scheme documentation requires that the Certification Bodies shall carry out controls to PEFC logo usage (INMETRO Administrative Directive no. 369/09 - RAC, item 8.2 (Annex 30). According to the INMETRO Administrative Rule 179, the Directorate of Quality (Dqual) is responsible for the administration and surveillance regarding the correct use of Inmetro Identification seals (Annex 31).

- (16) Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?**

Conclusion 58

Documentation conforms to the PEFC requirements

The scheme documentation requires that a maximum period for surveillance audits does not exceed one year. For forest management this is stipulated in ISO 17021 item 9.3.2.2 and for CoC in INMETRO Administrative Directive no. 369/09 - RAC, item 6.2.1.2 (Annex 30).

- (17) Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?**

Conclusion 59

Documentation conforms to the PEFC requirements

The maximum period of assessment audit is 5 years.

Forest management: (NIT-Dicor 053 - item 9.4.4 (Annex 4).

CoC: INMETRO Administrative Directive N°. 369/09 - RAC - item 5.5 (Annex 30).

- (18) Does the scheme documentation include requirements for public availability of certification report summaries?**

Conclusion 60

Documentation conforms to the PEFC requirements

Certification report summaries must be publicly available by the CAB.

Forest management: (NIT-Dicor 053 – item 9.4.2 and 9.4.5 (Annex 4).

CoC: INMETRO Administrative Directive N°. 369/09 - RAC - item 6.1.5.2 and Annex D (Annex 30).

- (19) Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?**

Conclusion 61

Documentation conforms to the PEFC requirements

Audit must include feedback and comments as audit evidence.

Forest Management: (NIT-Dicor 053 - item 9.4.2.2. and 9.4.2.4 (Annex 4)

CoC: INMETRO Administrative Directive N°. 369/09 - RAC - item 6.1.5.3 (Annex 30)

- (21) Does the scheme documentation require that certification bodies carrying out forest management and/or chain of custody certification shall be accredited by a national accreditation body?**

Conclusion 62

Documentation conforms to the PEFC requirements

CB shall be accredited by the national accreditation body.

CERFLOR uses the structure of the Brazilian System of Conformity Assessment – SBAC which includes the national accreditation body as established in the CONMETRO Resolution N^o. 04/02, item 4.2 (Annex 3).

INMETRO as the national accreditation body for CERFLOR program performs the function of accreditation body of SBAC², in a transparent, indiscriminate and independent way, in harmony with the international practices in vigor and in conformity with the principles and policies defined by CONMETRO.

Comment: Based on the notification process (see Conclusion 67) description there is an option that other institutions, in addition to INMETRO, may act as accreditation body. How they may obtain an authorization from CONMETRO/CBAC to act as AB is not clear on the basis of the documentation. Consultant recommends that for the next standard revision INMETRO will clarify the issue in the scheme documentation.

- (22) Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?**

Conclusion 63

Documentation conforms to the PEFC requirements

CERFLOR uses the structure of the Brazilian System of Conformity Assessment – SBAC which requires that the certificate shall bear an accreditation symbol. (NIE-Cgcre-009-rev.07, (Annex 31).

- (23) 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 recognized by the above mentioned organizations?**

Conclusion 64

Documentation conforms to the PEFC requirements

CONMETRO Resolution N^o. 04/02 (Annex 3), establishes the Term of Reference of the Brazilian System of Conformity Assessment - SBAC, where INMETRO is the only national accrediting body. Being recognized by the IAF, INMETRO/Cgcre satisfies the requirements of ISO 17011.

Comment: Based on the notification process (Conclusion 67) there is an option that other institutions, in addition to INMETRO, may act as accreditation body. How they may obtain an authorization from CONMETRO/CBAC to act as AB is not clear on the basis of the documentation. Consultant recommends that for the next standard revision INMETRO will clarify the issue in the scheme documentation.

- (24) Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?**

² SBAC – Brazilian Conformity Assessment System

Conclusion 65

Documentation conforms to the PEFC requirements

The applied certification procedures in forest management certification shall be compatible with ISO 17021. (Annex 4: 9.2)

The applied certification procedures in chain of custody certification shall be compatible with ISO Guide 65 (Annex 30:5.4).

- (25) Does the scheme documentation require that certification body undertake chain of custody certification against Annex 4 as “accredited certification” based on ISO Guide 65?**

Conclusion 66

Documentation conforms to the PEFC requirements

See above: Conclusion 65. (Annex 30:5.4)

- (26) Does the scheme documentation include a mechanism for PEFC notification of certification bodies?**

Conclusion 67

Documentation partly conforms to the PEFC requirements

The Certification Bodies accredited by the National Accreditation Bodies are notified by INMETRO/Dqual/Seapo (see Figure 4.1) area as internal rule, which is in accordance of PEFC guideline. The scheme documentation does not include a mechanism description.

Certification bodies operating PEFC certification in Brazil shall be notified by INMETRO through a contract signed between INMETRO and CB. In cases when the accreditation is done by other AB the contract is signed by Dqual/INMETRO to ensure notification.

Comment: Based on the notification process it seems that there is an option that other institutions, in addition to INMETRO, may act as accreditation body. How they may obtain an authorization from CONMETRO/CBAC to act as AB is not clear on the basis of the documentation.

- (27) Are the procedures for PEFC notification of certification bodies non-discriminatory?**

Conclusion 68

Documentation conforms to the PEFC requirements

The Certification Bodies accredited by the National Accreditation Bodies are notified by INMETRO/Dqual/Seapo area as internal rule, which is in accordance of PEFC guideline. Notification procedures based on standard contracts are non-discriminatory.

Certification bodies operating PEFC certification in Brazil shall be notified by INMETRO through a contract signed between INMETRO and CB. In cases when the accreditation is done by other AB the contract is signed by Dqual/INMETRO to ensure notification. Based on the contract models provided by the applicant, notification procedures are equal and non-discriminatory.

9. STAKEHOLDER VIEWS

9.1 Summary of comments submitted by PEFC council members and stakeholder questionnaire

The stakeholder questionnaire was sent out early September, 2010 to 161 stakeholders listed in INMETRO e-mailing list. 16 stakeholders responded to the questionnaire. Respondents represented stakeholder groups as follows:

1 Government, 2 Environmental NGOs, 2 Research institutions, 2 Forest industry organizations, 8 others stakeholder groups. No responses were received from forest owners or forest managers, social NGOs, or trade organizations.

In part the low response rate was a consequence of out dated contact information on the list maintained by INMETRO. Another conclusion which could be drawn from the low response rate is that, in general, the stakeholders were satisfied with the revision process and had not observed any significant shortcomings in the process.

The stakeholder questionnaire did not reveal any misconducts or failures in the revision process. The only minor weakness presented in the questionnaire was related to the fact, that the involvement of the stakeholders on social interests was weak if not nonexistent although all relevant parties were invited to the process.

The responses to the stakeholder questionnaire emphasized that all of the views had been properly included into the revision process and there had not been any issues that would have needed dispute settlement.

9.2 International consultation

Indufor has not received any comments or statements through the international consultation launched by the PEFC Council on 31/08/2010 for a 60 day public comment period.

10. RESPONSES TO THE COMMENTS OF PANEL OF EXPERTS

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
General			
	<p>The assessment – a desk study – is based on the relevant documentation, correspondence and communication including a questionnaire with a 10% response rate (16 returns). It is a careful and rather detailed study particularly as it refers to and relies on Brazilian legislation on all levels. The difficulty remains the proof of its implementation and execution.</p> <p>I agree with the recommendation and fully support it. It is the task of the PoE to comment on the assessment and not on the scheme. However, sometimes both items are closely linked. As the Brazilian standards, criteria and indicators are rather general, specific references to Brazilian legislation and regulations on all levels are necessary. They are, however, difficult to trace for third persons. The reason for being so general seems to be the large geographical area the system covers – in European terms of continental rather than national dimension.</p> <p>The assessment uses original quotations, which means that the sometimes poor English language is not improved – sometimes even leading to misunderstandings -, mistakes are quoted and thus repeated (instead of being corrected). The usage or absence of the article is somehow irritating, so is the usage if the capital or small letters even within one chapter. The comments of the assessment asking for improvements are fully supported.</p> <p>CERFLOR standard must not be fully identical with PEFC's requirements, but it must meet the essential requirements in order to fit under the international umbrella.</p> <p>The 30 days consultation period (native forests) seems to be a more formal issue under the given circumstances (no changes.); however, it remains to be a weakness of the process and ought to be discussed. There is full support of the assessment's comments (p.16, 14).</p>		
p.6	<p>A 10% return rate of the questionnaire does not mean too much unless it is specified (who responded/which groups and what were the issues – of minor or major importance?), please attach a copy of the questionnaire.</p>		<p>Respondents represented stakeholder groups as follows:</p> <ul style="list-style-type: none"> 1 Government 2 Environmental NGO 0 Social NGO 0 Forest owner or forest manager



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
			2 Research institution 2 Forest industry 0 Trade 8 Others The questionnaire is attached to the final report (Annex 2)
Report			
p.11 (6 and 7)	<p>Conclusion 2 Documentation <u>Documentation conforms to the PEFC requirements</u> ABNT administrative instructions are applicable in CERFLOR development and revision procedures (Annexes 9 & 10). They require that relevant interest parties representing all different aspects of sustainable forest management (producer, consumer and neutral parties) shall be invited into standard setting process and that they are fairly and equally represented.</p> <p>Conclusion 2 Practice <u>Practice conforms to the PEFC requirements</u> According to the list of invited stakeholders as well as the stakeholder consultation prove that all relevant stakeholder groups were invited in the standard setting and revision processes (Annex 11). Stakeholder consultations also</p>	Social interests are missing, however trade unions are mentioned; please clarify (p. 44, 48 comment).	



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	<p>confirm that the standard development process is seen transparent and stakeholder groups are well represented. Although some invited interest groups, representing especially the social interests, chose not to participate various interests were adequately represented in standard setting forum.</p> <p>However, to maintain active participation and consultation the consultant recommends that e-mailing list and other lists of stakeholders would be updated frequently.</p>		
P 14, 1st line	<p>Has the information on the development process been distributed and discussed?</p> <p>Practice conforms to the PEFC requirements</p> <p>ABNT's standard was discussed in a few meetings and distributed to members of the Study Commission. Subsequently, the standard was submitted to a process of national consultation in the ABNT's website for vote and comment for a period of 60 days, as well as an announcement about this consultation was published in the Federal Gazette. (Note consultation period for standard for natural forests was 30 days).</p>	<p>... a few meetings (= rather vague)</p> <p>I strongly support the assessment's multifold comments (more than usual/average) for improvements during the following standard revision (f.e.: p.21, 18) at the latest</p>	
p.1, 5 th line		... endorsed <u>by</u> ...	Corrected in the final report.
p.1, 9 th		... PEFC <u>C</u> ouncil...	Corrected in the final report.



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
line			
p. 3, 1 st line		... for PEFC <u>re</u> - endorsement	Corrected in the final report.
p. 3, 9 th line		... PEFC Council, ...Cerflor Scheme (see: p. 3, 1, 11st line)	Corrected in the final report.
p. 6, 4 th line		...utilized <u>the</u> following data...	Corrected in the final report.
p. 13, 14 th line		... Study Commission through its...	Corrected in the final report.
p. 14, 16		... to national voting ... for native forests (singular and plural) ... published in the Federal Gazette (a national newspaper?)	Corrected in the final report.
p. 18, 6.2, 3, 21		... producer group is <u>in</u> compliance	Corrected in the final report.
p. 19, 9, 24		... applicable laws and regulations <u></u>	Corrected in the final report.
p.22, 37, 33		.. established <u>in</u> the standard (a word is missing)	Corrected in the final report.
p. 23, 42, 37,e		There seems to be something wrong with the language, please clarify	Clarified in the final report.
p.24, 44, 39		...be issued <u>on</u> behalf ofCertif. copies <u>may</u> be provided (better: shall be...) may equals should (the "old" shall and should issue)	Corrected in the final report.



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
p.24, 46, 41		... group is in compliance...	Corrected in the final report.
p.31, 8, 8.1		... accreditation <u>is</u> done...	Corrected in the final report.
p. 32, 1 st line		... certification of forest management (also p. 33, 11, 53 ... forest instead of forestry)	Corrected in the final report.
p. 33, 1 st line		criteria <u>are</u> established	Corrected in the final report.
Annex 1, p. 1.3		Inmetro is PEFC's National Governing ... (delete: <u>the</u>)	Corrected in the final report.
p. 29, 28	<p>Does the scheme documentation describe that forest owners should submit all the forest area under his management in the catchment area for the group certification? (<i>not obligatory to be met but should be aimed at</i>)</p> <p>NIT-Dicor 053 - 8.1 and Annex A, item A-5.c (Annex 4).</p> <p>A-5 c) The forest producer group is responsible for keeping forest area records, including identification of the owners and units or areas with certified forest management.</p>	Partly conforms or even: does not conform?	Changed to "does not conform". The comment is valid – the documentation does not clearly set this requirement: forest management unit does not equal to "all the forest area under his management" although this is often the case in practice.
p. 30, 32		... may be provided – shall be provided (see above)	Corrected in the final report.
p. 99, 10		... must <u>produce</u> evidence (a word is missing).	Corrected in the final report.
Exec sum/2	EIA	Not included in Abbreviations	EIA – Environmental Impact Assessment included in the abbreviations



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
4/7	(Gcgre)	Would be (Cgcre)	Corrected in the final report.
Figure 4.1/7		Translate the names in English because the report use the English translations	Unfortunately, due to very tight schedule of the finalization, the translation of the picture could not have been included in the final report.
8.1/31	... shall be accredited by INMETRO.	In the comments to Conclusions 62, 64 and 67: "... there is an option that other institutions, in addition to INMETRO, may act as accreditation body." This is probably not an option or "exceptional circumstance" now when INMETRO is a member of IAF. Compare PEFC Annex 6.5.	This option, even though unlikely, still exists in the scheme documentation. According to the Criteria for the Accreditation of Products certification bodies (Annex 29; 8.7) the OCP must establish a heads of agreement, if it pretends to use services from a certification body accredited by another member signatory of IAF. Thus any accreditation body has to be a signatory of IAF.
8.1/31	In cases when the accreditation in done is ...	Corrected in the final report.
8.2/36, 37	<i>Comment (to Conclusions 62, 64 and 67): Based on the notification process it seems that there is an option that other institutions, in addition to INMETRO, may act as accreditation body. How they may obtain an authorization from CONMETRO/CBAC to act as AB is not clear on the basis of the documentation.</i>	This is probably not an option or "exceptional circumstance" now when INMETRO is a member of IAF. Compare PEFC Annex 6.5. I suggest that this option would be deleted in the documentation.	According to the Criteria for the Accreditation of Products certification bodies (Annex 29; 8.7) the OCP must establish a heads of agreement, if it pretends to use services from a certification body accredited by another member signatory of IAF. Thus any accreditation body has to be a signatory of IAF.
8.2/36, 37	... authorization from CONMETRO/CBAC to...	CBAC is not included in the Abbreviations. Or shall it be SBAC?	CBAC - Brazilian Conformity Assessment Committee Abbreviation included in the list in the final



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
			report.
ii	ABBREVIATIONS	Need to add AB and CB as are referenced in report but not included in Abbreviations	AB (Accreditation Body) and CB (Certification Body) are included in the abbreviations in the final report.
li	ABBREVIATIONS	General comment – within the text in would be preferable to stick to CAPITALS for frequently referenced words e.g. CERFLOR, INMETRO	Corrected in the final report.
1	EXECUTIVE SUMMARY 1 st para, 2 nd sentence 4 th sentence	Expression 'The CERFLOR scheme ...' 'by' for 'y'	Corrected in the final report.
1	EXECUTIVE SUMMARY 2 nd para, 1 st sentence	Expression '... were submitted <u>to the</u> PEFC ...'	Corrected in the final report.
1	EXECUTIVE SUMMARY 3 rd para, 3 rd sentence	Consistency of terms Panel of Experts is used in 2 nd sentence, so should be the same in 3 rd sentence	Corrected in the final report.
1	EXECUTIVE SUMMARY 4 th para, 1 st sentence 3 rd sentence 5 th sentence	Expression '(as submitted <u>to the</u> PEFC ...' The use of the term 'in general' requires clarification in terms of consultant's evaluation for PEFC. Expression '... to the PEFC <u>requirements</u> of minor significance <u>were</u> found.' Do the ABNT administrative rules provide the same outcome as the PEFC requirements? Do the non-conformities require recommendations for action (CAR) by CERFLOR within a defined timeline or prior to	Expression is clarified in the final report: The documentation of the CERFLOR scheme (as submitted for PEFC Council in January 2010) meets the PEFC Council minimum requirements at sufficient level. The administrative rules provide the same outcome as the PEFC requirements. Recommendations for action which are given in the report are addressed to the next scheme revision.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	6 th sentence	the next revision?	
1	Recommendations 1 st para	There is only one recommendation as the rest are findings! Would use 'conforms' or 'complies' instead of 'is in line' as these words are more relevant to the PEFC	The issue is addressed in the paragraph title. Wording is changed in the final report.
1	Recommendations 2 nd para, 2 nd sentence 3 rd sentence	The 1 st paragraph of Executive Summary' indicates that there are 3 standards but only one standard is inferred here for CERFLOR. For the 'various interests', who do they cover? Would use 'invited' or 'participated' instead of 'ensured' as these words are more relevant to the PEFC	Wording is corrected in the final report to highlight that there are three standards Various interests cover: forest industry, government and civil society. Wording changed in the final report.
2	Recommendations 5 th para	Would use 'does not conform' or 'does not comply' instead of 'is not fully in line' as these words are more relevant to the PEFC	Corrected in the final report.
2	Recommendations 6 th para	Expression '... can be seen <u>as a participatory process</u> and in ...'	Corrected in the final report.
2	Recommendations 7 th para	Would confirm that there is no regional certification.	Issue confirmed in the final report.
2	Recommendations 8 th para, 1 st sentence	What type of legislation – at this point, it should indicate whether national, state, provincial, etc If not in this section, there must be explicit	National legislation – issue specified in the final document.



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	3 rd sentence	evidence on how legislation provides conformance for requirements assessed as non-conformities (N/Cs)	The applicant provided references to relevant legislation in cases where the documentation did not fulfil the PEFC/ITTO requirements. This evidence on legislation is summarized in the minimum requirement checklist (Annex 1 in this report) as it is too ample to be discussed in the final report.
2	Recommendations 9 th and 10 th paras	There must be an explanation as to how N/Cs are resolved for CERFLOR going forward	The remaining non-conformities do not jeopardize the sustainability of the forest management as the standards comply mainly with the very detailed ITTO reference base. However, it is recommended that these non-conformities shall be addressed and corrected in the following standard revision.
2	Recommendations 12 th para	Surely, the consultant understands that the PEFC has requirements not rules – need consistency in terms.	Terminology streamlined in the final report.
2	Recommendations 13 th para	Why not reference the PEFC's CoC Standard appropriately?	Terminology streamlined in the final report.
2	Recommendations 14 th para	I would have thought that it was more imperative to meet IAF requirements for accreditation than ISO as ISO is for standardisation!	As a member of IAF, INMETRO complies with its requirements for accreditation.
2	Recommendations Last para	Expression As the item is plural, it is 'complies' not 'comply'	Corrected in the final report.
3	INTRODUCTION 1 st para	INMETRO, whilst seeking re-endorsement of its standards, would also be seeking re-endorsement of the other documents in the	Terminology corrected in the final report – scheme instead of standard.



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	<p>1st sentence</p> <p>3rd sentence</p>	<p>CERFLOR scheme</p> <p>Expression</p> <p>'... applied <u>to the</u> PEFC Council <u>for</u> endorsement ...'</p> <p>'The revised <u>CERFLOR</u> scheme was submitted <u>for the</u> ...'</p>	<p>Corrected in the final report.</p> <p>Corrected in the final report.</p>
3	<p>INTRODUCTION</p> <p>2nd para, 1st sentence</p>	<p>Expression</p> <p>'Council' for 'council'</p>	<p>Corrected in the final report.</p>
3	<p>1.1</p> <p>3rd para</p> <p style="text-align: right;">Reporting</p>	<p>Expression</p> <p>'... the recommendations of <u>Indufor Oy</u> to the PEFC Council are presented in <u>Chapter 2</u> and the Executive <u>Summary</u>.'</p> <p>There is no reference to Chapter 3. Need to check on further references to chapters as they appear out of alignment with the ToC and the headings of the Chapters.</p>	<p>Corrected in the final report.</p> <p>Numbering and references revised in the final report.</p>
4	<p>Recommendations</p> <p>1st para, 2nd sentence</p>	<p>Expression</p> <p>Would use 'conforms' or 'complies' instead of 'is in line' as these words are more relevant to the PEFC</p> <p>Replace the 2nd 'requirements' with 'Council'</p> <p>There should be a recommendation(s) on how CERFLOR deals with the N/Cs and partial conformities identified by the consultant – this should be defined by a time period or at least by</p>	<p>Terminology streamlined in the final report.</p> <p>Issue addressed in the final report with the following sentence: The remaining non-conformities do not jeopardize the</p>



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		the next scheme revision	sustainability of the forest management as the standards comply mainly with the very detailed ITTO reference base. However, it is recommended that these non-conformities shall be addressed and corrected in the following standard revision.
4	<p>Recommendations</p> <p>4. 1st para, 1st sentence</p> <p>3rd sentence</p>	<p>Expression</p> <p>'... in many issues based on existing national (and other) legislation.'</p> <p>Use of the term 'mainly covered' requires clarification that they are covered in the relevant chapter</p>	In the final report reference is made to following paragraphs explaining non conformities.
4	<p>Recommendations</p> <p>2nd & 3rd paras</p>	<p>What does the consultant recommend to close the N/Cs?</p> <p>What does the consultant recommend for partial conformities – action within a defined time or prior to next revision?</p> <p>I would expect that the PEFC would need advice on these as part of the overall re-endorsement recommendation</p>	<p>Recommendation is given in the final report:</p> <p>The remaining non-conformities do not jeopardize the sustainability of the forest management as the standards comply mainly with the very detailed ITTO reference base. However, it is recommended that these non-conformities shall be addressed and corrected in the following standard revision.</p>
4	<p>Recommendations</p> <p>5. & 6.</p>	In all other dot points have used 'requirements', so why change to 'rules' for these two? Surely, all dot points relate to 'requirements'	Terminology streamlined in the final report.
5	<p>MATERIAL AND METHODS USED IN THE ASSESSMENT</p> <p>1st para</p>	<p>Expression</p> <p>It is more commonly called a 'desk-top study'</p>	Both terms are commonly used.
5	MATERIAL AND METHODS USED IN THE	The heading is 'assessment' and 'assessment'	Terminology streamlined in the final report.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	ASSESSMENT 2 nd para	is used in the 3 rd para, so why 'study' in this para. Need to ensure consistent terms are used in report Would be best to indicate the URL for the PEFC web page to avoid any doubt	URL added in the paragraph.
5	MATERIAL AND METHODS USED IN THE ASSESSMENT 3 rd para	Expression '... application for endorsement, the information received in a stakeholder questionnaire and <u>further information requested</u> from INMETRO.	Corrected in the final report.
5	MATERIAL AND METHODS USED IN THE ASSESSMENT 4 th para	Expression 'includes' for 'included'	Corrected in the final report.
6	MATERIAL AND METHODS USED IN THE ASSESSMENT 5 th para	Expression 'were' for 'are' to ensure correct tense	Corrected in the final report.
6	MATERIAL AND METHODS USED IN THE ASSESSMENT 6 th para	2 nd & 3 rd dot points – in this context, 'responses' may be a better expression than 'answers'	Terminology streamlined in the final report.
6	MATERIAL AND METHODS USED IN THE ASSESSMENT 8 th para	Expression '... the scheme was under <u>an</u> international <u>public consultation period convened</u> by the ...	Corrected in the final report.
7	STRUCTURE OF THE BRAZILIAN FOREST CERTIFICATION PROGRAM 1 st para	Expression 'the' for 'The' I do not understand the context of 'not phased'?	Wording changed in the final report.
7	STRUCTURE OF THE BRAZILIAN FOREST CERTIFICATION PROGRAM 3 rd para, 1 st sentence	Expression 'The <u>national accreditation function</u> is executed ... (Gcgre) <u>whilst</u> management of the forest	Wording changed in the final report.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	3 rd sentence	certification scheme by the PEFC ...' 'independence' for 'independency' and 'at Fig. 4.1' for 'below'	
7	STRUCTURE OF THE BRAZILIAN FOREST CERTIFICATION PROGRAM 4 th para, last sentence	Clarification The procedures <u>described</u> above have been evaluated and approved by the 2008 Peer Evaluation <u>undertaken by IAF/ILAC for national accreditation bodies.</u>	Wording changed in the final report.
7 8	STRUCTURE OF THE BRAZILIAN FOREST CERTIFICATION PROGRAM 5 th para, 1 st sentence 2 nd sentence	Expression ' The INMETRO has management <u>which delivers</u> certified ... Correct tense and expression '... standard <u>are</u> mandatory parties <u>undertaking</u> forest ...'	Wording changed in the final report. Wording changed in the final report.
8	STRUCTURE OF THE BRAZILIAN FOREST CERTIFICATION PROGRAM 6 th para	What are the levels of 'governments'?	Refers to ministry level. Plural removed in the final report.
8	4.1 Scheme organization 2 nd para	Expression ' <u>The</u> Brazilian standardization ...' Based on the 3 rd para wouldn't it be 'divisions' not 'sub-systems'?	Wording changed in the final report.
8	4.1 Scheme organization 3 rd para	To clarify, wouldn't it be best to include 'ie the PEFC national governing body'?	Wording changed in the final report.
8	4.1 Scheme organization 4 th para, 1 st sentence 2 nd sentence	'... (WG), <u>which was</u> proposed ...' What Technical Council? ABNT, INMETRO or other Who gives the 'final approval' – this is missing	WG also approves standard after consultation. Issue clarified in the final report.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		Replace 'then' with 'subsequently' for better expression	Wording changed in the final report.
8	4.1 Scheme organization 5 th para, 1 st sentence 2 nd sentence 3 rd sentence	'publicity' – is this publicly available or openness? Is the independent mean it6 is part of Dqual? Delete the 'the' from in front of INMETRO Expression '... role in the <u>standardization</u> process.'	Wording changed in the final report.
10	5.1 Background 1 st para, 1 st sentence 2 nd sentence	What does the consultant mean by 'preparation process'? Is it – 'The development process <u>for an</u> ABNT ... Expression '... as well as in <u>alignment</u> with PEFC requirement's <u>for standards</u> revisions.'	Wording changed in the final report. Original sentence refers to changes in PEFC technical documentation.
10	5.1 Transparency and Consultation 3 rd para, 2 nd sentence	Expression 'During the <u>national</u> public consultation, the comments for <u>the</u> planted comments for <u>the</u> CoC ...'	Corrected in the final report.
10	5.1 Transparency and Consultation 4 th para, 3 rd sentence	Whilst a N/C under PEFC requirements, it does have conformity under national standard setting practice which mitigates its N/C under the PEFC	This recommendation is also given in the report.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		– despite this, there needs to be a recommendation that future standards revisions shall be 60 days for public consultation	
11	5.2 Consultant's conclusion	Whilst the checklist provides commentary for (2) to (5), there is no evidence in the report?	Reference is made to Minutes of the meetings in the final report.
11	5.2 (6) Conclusion 2 Documentation 2 nd sentence	Expression 'interested' for 'interest' Are the three parties in brackets equivalent to environmental, social and economic interests?	Corrected in the final report. Interpretation of producer, consumer and neutral parties is not specified in the scheme documentation.
11	5.2 (7) Conclusion 3 Practice 2 nd sentence	Expression '... representation of <u>the</u> different ...'	Corrected in the final report.
12	5.2 (8) Conclusion 4 Practice 2 nd sentence	Expression '... of all relevant <u>interested</u> parties have been ...'	Wording changed in the final report.
12	5.2 (9) Conclusion 5 Practice	Do the minutes relate solely to forest management of to forest management and CoC?	Minutes provided as evidence relate both to CoC and forest management.
12	5.2 (11) Conclusion 7 Documentation	An observation – no doubt would be in Portuguese – is it to be in English or just the language of the PEFC member?	If the comment is understood correctly – English translation of the rules was provided as a part of the scheme documentation.
13	5.2 (12) Conclusion 8 Documentation 2 nd para	Expression 'The provided application complaints – <u>that</u> any interested ...' There is no title for the documents referred to as	Wording changed in the documentation and titles of the referred annexes added.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		Annex 14 and Annex 27 – this occurs further through the report. Need to be consistent and add in the title where required further in report	
13	5.2 (13) Conclusion 9 Documentation	Expression '... Secretary to <u>send</u> forth <u>to</u> the required contacts <u>of</u> feasible participants, a formal ...	Wording changes in the final document.
13	5.2 (14) Conclusion 10 Documentation	Expression '... ... Study Commission, <u>through</u> its' Secretary, to carry ...'	Corrected in the final report.
14	5.2 (14) Conclusion 10 Practice 1 st sentence	The text indicates only one standard but there are at least two being natural forests and planted forests! Expression '... in a <u>number of WG</u> meetings ...'	Wording changed in the final document.
14	5.2 (15) Conclusion 12 Documentation	Expression 'ABNT <u>Administrative Instruction Manual</u> ...' – this accords with title provided in (14)	Wording changed in the final document.
15	5.2 (17) Conclusion 13 Practice 1 st para, 2 nd sentence 2 nd para, last sentence 3 rd para, 2 nd sentence	Expression '... considered <u>as</u> relevant ...' '... proposals <u>had</u> not received <u>any</u> technical ...' The date needs to be in dd/mm/yyyy format for consistency Tense – replace 'are in analyses' with 'were analysed'	Wording changed in the final document.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
16	5.2 (19) Conclusion 15 Practice	The consultant's assessment is only for natural forests – this needs to be distinguished in the text. Consultant's comment – this is really a recommendation to the PEFC for the next revision of the natural forest standard of CERFLOR. Needs to be in Chapter 2	Wording changed in the final document. Recommendations is not added in Chapter 2 as the recommendation is not for the PEFC but for the applicant.
16	5.2 (20) Conclusion 16 Documentation and Practice 2 nd para	Who is the 'it was' – ABNT, INMETRO or other? The consultant's comment could be rounded off by a statement like – 'Accordingly, the PEFC are responsible for standard development whilst INMETRO is responsible for accreditation procedures in Brazil.'	Wording changed in the final document.
17	5.2 (36) Conclusion 18 Practice 2 nd sentence	Expression '... made to PEFC <u>technical documentation and requirements.</u> '	Wording changed in the final document.
17	5.2 Consultant's conclusion	Whilst the checklist provides commentary for (37) to (41), there is no evidence in the report?	The report summarizes requirements which are the most important for scheme endorsement (highlighted with green colour in the checklist). (37) and (41) are additional requirements.
18	6.1 Background 3 rd sentence 4 th sentence	If use the ABNT designations for standards, why not use the PEFC designation for the CoC standard? Is it 'complete' or 'complement'?	PEFC designation highlights that the ABNT has adopted PEFC CoC standard as such.
18	6.2 (2) Conclusion 20 2 nd para, 1 st sentence	Need to justify the use of 'reasonably' in view of the PEFC requirement.	Wording changed in the final document.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	3 rd sentence	'detailed description of indicators' is this the elements, components or the issues contained within indicators? This sentence is really a recommendation but it isn't in Chapter 2, dot point 3.	The recommendation is addressed to application, not to PEFC – this is the reason for not including the recommendation in Chapter 2.
18	6.2 (3) Conclusion 21 1 st para 2 nd para	Expression '... or the <u>whole area of a forest producer group</u> ' – is this a better expression? Replace 'on' with 'in' for association with compliance	Wording changed in the final document.
19	6.2 (8) Conclusion 23	The paragraphs need to be swapped as the 2 nd paragraph in the report is really the primary response Delete 'also' from the 2 nd paragraph	Wording changed in the final document.
19	6.2 (9) Conclusion 24 2 nd para	What is meant by 'existing mechanisms'? Without clarification, cannot understand conformity assessment	Wording changed in the final document.
19	6.2 (10) Conclusion 25 1 st para 2 nd para, 2 nd sentence	Expression Replace 'proves' with 'proof' 'Thus any violation <u>of</u> legislation will be addressed in the <u>certification audits</u> '	Wording changed in the final document.
20	6.2 (11) & (12) Conclusion 26 & 27	How is ILO 87 implemented in the standards – this isn't answered in these two questions. It requires a response to indicate how CERFLOR	According to INMETRO "All the Core ILO Conventions elements have been ratified by the country and implemented through



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		cover the intent of ILO 87.	the legislative framework". The core elements are covered by national legislation even though Brazil has not ratified the convention.
21	6.2 (18) Conclusion 30 1 st para 3 rd para	Expression 'Both <u>of</u> CERFLOR's forest in their Principle 2 ...' Consultant's comment – this is really a recommendation to the PEFCC for the next revision of the standards of CERFLOR. Needs to be in Chapter 2 '...during the <u>next</u> scheme revision <u>that</u> this requirement ...'	Wording changed in the final report. The recommendation is addressed to application, not to PEFCC – this is the reason for not including the recommendation in Chapter 2.
21	6.2 (36) Conclusion 32 2 nd para	This is not very well explained – it appears to be a recommendation – see comment in (18)	Clear recommendation is added in the final report ("The consultant recommends that this requirement would be given in the Forest Management Standards as well"). The recommendation is addressed to application, not to PEFCC – this is the reason for not including the recommendation in Chapter 2.
22	6.2 (37) Conclusion 33 1 st para 2 nd para	Expression '... established <u>in</u> the standard, as well as <u>being responsible for</u> ... The title suggests that it is for the CB and not for	The confusing statement originates of the fact that the group certification requirements are part of a document which sets "Additional Criteria for Forest Management Certification Body on



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		the forest manager but the consultant seems to indicate that the forest manager must conform with a document used by a CB which provides the conformity for this question. This relates back to 2 nd para of Conclusion 32 and the consultant's assessment.	compliance to NBR 14789 and/or the NBR 15789" – the comments was there to remind that for clarity reasons the group certification requirements should rather be a separate document or annexed to the forest management standards.
22-24	6.2 (38), (39), (40), (42), (43), (44), (45), (46), (47) Conclusion 34,35, 36, 37, 38, 39, 40, 41, 42	See comment for 6.2 (37) as seems applicable to all of these questions and responses	
25	6.2 (43) Conclusion 43 3 rd para	Expression 'Besides <u>the above</u> , the System ...'	Wording changed in the final report.
26	7. PERFORMANCE REQUIREMENTS/ITTO GUIDELINES	I have reviewed the assessments from page 27 to 30. I believe that the consultant needs to provide an overarching statement in relation to the compatibility/equivalence of standard requirements with PEFC requirements. It would need to indicates something like – 'On the balance of a substantial number of requirements demonstrating conformity, a small number with partial conformity and 2 identified non-conformities for which specific action is required, the standards provide the performance and system requirements for certification of forest management to comply with the expectations of the ITTO and PEFC requirements.'	Conclusion added in Chapter 7 in the final report as recommended.
31	8.1 Background	Expression	Wording changed in the final report.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	1 st para	'... carrying out <u>certification to CERFLOR's standards</u> shall be ...'	
31	8.1 Background 2 nd para, 1 st sentence 2 nd sentence	Expression '... for the accreditation ...' '... NIT-DICOR-024 <u>respectively and are</u> annexed ...'	Wording changed in the final report.
31	8.1 Background 3 rd para, 1 st sentence 2 nd sentence	Expression '... communicate <u>within</u> the forest certification <u>scheme</u> , specific ...' I believe it is 'standards' as there are two to cover natural forest and planted forests.	Wording changed in the final report.
31	8.1 Background 4 th para, 2 nd sentence	Expression Change 'when' to 'where'	Wording changed in the final report.
31-35	8.2 Consultant's conclusion	When responding to the conclusions, it would be best to separate the documentation between Forest Management and CoC i.e. start the CoC response on the next line – it allows a clearer understanding of the responses Expression The term is 'forest management' not 'forestry management' where used in this chapter.	Wording changed in the final report.
31	8.2 (1) 2 nd para, 3 rd sentence 4 th sentence	Expression '... management certification <u>in the CERFLOR scheme</u> are ensured through compliance <u>with INMETRO</u> ...' '... of the chain of custody, the <u>certifying bodies within the CERFLOR scheme</u> must be ...'	Wording changed in the final report.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
31	8.2 (2) 1 st para	Expression '... requires that a CB for of custody <u>fulfils</u> the ...'	Wording changed in the final report.
32	8.2 (2), (3), (4)	See comment in 8.2 (1) as the same text is repeated	Wording changed in the final report.
32	8.2 (4) 1 st para, 1 st sentence 2 nd sentence	Expression '... have the <u>relevant</u> technical ...' ' <u>The</u> CB's technical competence requirements <u>are</u> based ...'	Wording changed in the final report.
32	8.2 (5) 1 st para 3 rd para	This response doesn't seem to answer specifically compared to the response for (4) i.e. does NIT-DICOR-024 cover this issue? Expression '... have the <u>relevant</u> technical ...' The INMETRO document – is it included as an Annex?	Reference to the relevant scheme documentation is made in the final report. INMETRO document is in Annex 30.
32	8.2 (6) 1 st para	The response doesn't address forest management as it is specific to CoC. Expression '... requires <u>that</u> CBs carrying out ...'	Issue clarified in the final report. Wording changed in the final report.
33	8.2 (6) 2 nd para	The response doesn't answer the question with respect to the PEFC scheme.	Issue clarified in the final report.
34	8.2 (12) 2 nd para	Presume 'Guia' is Portuguese for 'Guide'? If not, please change to Guide. '... 65 <u>and</u> in the ...'	Yes- Guia is Guide and remains in the text at it is a ABNT document name (ABNT Brazilian translation of the ISO Guide 65).



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
34	8.2 (13) & (14) 2 nd paras	To be consistent with 8.2 (8), insert ' <u>In the case of certification of forest management,</u> ' at start of paragraph and insert appropriate verb for action	Requirements are not addressed only for certification of forest management (see title).
34	8.2 (15)	This document appears to be for CoC only – what about forest management?	Issue addressed in the final report: According to the INMETRO Administrative Rule 179, the Directorate of Quality (Dqual) is responsible for the administration and surveillance regarding the correct use of Inmetro Identification seals (Annex 31).
35	8.2 (16), (17), (18) & (19)	Need to indicate which document relates to forest management and which for CoC to ensure clarity of response eg in (16), ISO 17021 goes with FM and 369/09 goes with CoC	Issue clarified in the final report.
35	8.2 (21) 3 rd para	There is no need for footnote as has been clarified in 1 st paragraph	The abbreviation is not common in the report so the footnote is left here as a compliment for a reader.
36	8.2 (21) Consultant comment	Is this a recommendation which should be in Chapter 2. 7. or is it an observation for improvement within the CERFLOR scheme?	The following recommendation for the applicant is given in the final report: <i>Consultant recommends that for the next standard revision INMETRO will clarify the issue in the scheme documentation.</i>
36	8.2 (23) Consultant comment	See comment above in 8.2 (21)	The following recommendation for the applicant is given in the final report: <i>Consultant recommends that for the next standard revision INMETRO will clarify the issue in the scheme documentation.</i>
37	8.2 (26) 2 nd para	Need to clarify the Dqual/INMETRO relationship as INMETRO is the PEFC NGB, so it can't be	After a careful consideration, the assessment sees that different activities for



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	<p><u>Documentation partly conforms to the PEFC requirements</u></p> <p>The Certification Bodies accredited by the National Accreditation Bodies are notified by INMETRO/Dqual/Seapo (see Figure 4.1) area as internal rule, which is in accordance of PEFC guideline. The scheme documentation does not include a mechanism description.</p> <p>Certification bodies operating PEFC certification in Brazil shall be notified by INMETRO through a contract signed between INMETRO and CB. In cases when the accreditation is done by other AB the contract is signed by Dqual/INMETRO to ensure notification.</p> <p><i>Comment: Based on the notification process it seems that there is an option that other institutions, in addition to INMETRO, may act as accreditation body. How they may obtain an authorization from CONMETRO/CBAC to act as AB is not clear on the basis of the documentation.</i></p>	involved in accreditation	PEFC/CERFLOR accreditation and governance are sufficiently differentiated under INMETRO and risks for vested interested are minimized.
37	<p>8.2 (26) Consultant comment</p>	See comment above in 8.2 (21)	The abbreviation is not common in the report so the footnote is left here as a compliment for a reader.
38	<p>9. STAKEHOLDER VIEWS</p>		Wording changed in the final report.



Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
	<p>9.1 1st para, 2nd sentence 3rd sentence 4th sentence</p>	<p>Expression It is a 'questionnaire' not a 'question'! '<u>In part</u>, the low on the list <u>maintained by ???</u>. '... low response <u>rate</u> is that, in general, the stakeholders ...'</p>	
38	9.2	<p>Expression '... the PEFC Council <u>on dd/mm/yyyy for a 60 day public comment period</u>.</p>	Adjustment included in the final report.
1-105		If the consultant is using a direct lift of clauses/requirements from CERFLOR or other documentation, it would be best to show in inverted commas or by italics to indicate that this is the specific text which establishes the consultant's assessment in the Consultant comments column	Direct quotations are made in the checklist (Annex 1 in the final report), and clear reference is made to the source documentation in the checklist.
1-105		Need to explain why there are many of the cells in the Question column are shaded whilst other are clear	Requirements which are most important for scheme endorsement are highlighted with green shading in the checklist. Questions without shading are additional requirements. Explanation is added in the checklist attached to the final report.
1, 21, 33, 94	PART I; PART II PART V; PART VII	At the beginning of each PART, a list of the documents referenced in the questions relating to the PART would assist readers in checking on the relevance of the documents especially the titles as abbreviations are used in the 'Reference to application documents'	This would help the reader indeed and will be applied in possible future reports. Unfortunately this time we cannot do this due to time constraints (specific request from the PEFCC).



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
3	No. 8	Using this as an example, why show all the text here for this Question clauses/requirements but not show in other Questions e.g. No. 7?	The checklist has been a working tool for the consultant during the assessment work. In cases where the requirement is clearly and easily fulfilled, the text is usually shorter but when there is room for interpretation or there has been a need for further clarification, the text is given in more detail. The consultant has tried to optimize the space and avoid the checklist to expand too much in length.
6	No. 12	As an example, why is this different to the response in No. 8 where clauses are provided?	See above.
7	No. 13 Doc.	Is this a direct quote of the clause? Need to ensure any direct quote is shown appropriately	Not a direct quotation – clarified in the final report.
13	No. 20 - 34	As INMETRO have adopted the PEFC CoC standard, there is really no need to complete 20 to 34 as it relates to a CoC standard which is scheme specific and is not the case for CERFLOR. A short statement in reference to the application documents as in the report would suffice for the merged cells under this heading from No 20 to 34.	INMETRO had still followed same procedures as in "normal" standard development thus these questions were answered although they may not have been absolutely necessary.
33 - 92	No 1 - 160	The two N/Cs have consultant's comments to clarify the non-conformity but of the 15 partial conformities (from Table 7.2), 13 have a comment in PART V. To be consistent, the consultant needs to provide comments on the remaining 2 partials Whilst the consultants has indicated conformity	A general statement and recommendation is given in the final report (Chapter 2 & Executive Summary": The remaining non-conformities do not jeopardize the sustainability of the forest management as the standards comply mainly with the very detailed ITTO reference base. However, it



Indufor

Report chapter / page	Consultant's report statement	PoE member comment	Consultant's response
		for the rest of the requirements, comments have been provided for 33 of them to provide some commentary on the reasons why such an assessment was made by the consultant	is recommended that these non-conformities shall be addressed and corrected in the following standard revision.



Indufor

Annex 1

Guidelines PEFC Council Minimum Requirements Checklist	Revised on 4 February 2010	GL 2/2010
---	----------------------------	------------------

Indufor Review on the Compliance of the CERFLOR Forest Certification Scheme with the PEFC Council Minimum Requirements

(Ver 1.0, October 27, 2010)

TABLE OF CONTENTS

PART I:	MINIMUM REQUIREMENTS CHECKLIST FOR STANDARD SETTING PROCESS (ANNEX 2).....	1
1	SCOPE.....	1
2	CHECKLIST.....	1
PART II:	MINIMUM REQUIREMENTS CHECKLIST FOR CERTIFICATION SCHEMES AND THEIR IMPLEMENTATION (ANNEX 3)	21
1	SCOPE.....	21
2	CHECKLIST.....	21
PART V:	MINIMUM REQUIREMENTS CHECKLIST FOR SCHEME COMPLIANCE WITH ITTO GUIDELINES (ANNEX 3, CHAPTER 4.4)	33
3	SCOPE.....	33
PART VI:	MINIMUM REQUIREMENTS CHECKLIST FOR SCHEME SPECIFIC CHAIN OF CUSTODY STANDARDS (ANNEX 4).....	93
1	SCOPE.....	94
2	CHECKLIST.....	94



Indufor

Annex 1

PART I: MINIMUM REQUIREMENTS CHECKLIST FOR STANDARD SETTING PROCESS (ANNEX 2)

1 SCOPE

Part I covers the requirements for the standard setting process defined in Annex 2 of the PEFC Council Technical Document (*Rules for Standard Setting*).

2 CHECKLIST

NOTE: Requirements which are the most important for scheme endorsement are highlighted with green shading.

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
Standard setting for forest certification						
1.	Has the development of the certification standards been independent from the certification and accreditation process? ^[*1]	Annex 2, 3.2	Doc.	Yes	Annex 1-3: establishes ABNT as National Forum for Standardization and establishes and regulates INMETRO accreditation procedures for sectoral standardization.	<i>Conforms to PEFC requirements</i>
			Process	Yes	According to the resolutions (given in Annexes 1-3) processes of standardization and accreditation are independent.	<i>Conforms to PEFC requirements</i>
2.	Has the standard setting process been carried out at national and/or sub-national levels?	Annex 2, 3.3	Doc.	Yes	Annexes 1-3 describe the standard setting organization (ABNT) as a national organization. Cerflor is part of the national standardization system.	<i>Conforms to PEFC requirements</i>
			Process	Yes	The standard setting process has been carried out at national level (INMETRO – The Cerflor – Brazilian Forest Certification Program. Summary Jan 2010)	<i>Conforms to PEFC requirements</i>
3.	Has the standard setting process been coordinated by the PEFC National Governing Body? ^[*1]	Annex 2, 3.3	Doc.	Yes	Inmetro is PEFC's National Governing body in Brazil and recognizes ABNT as the national standardization body (Res 07, August 24, 1992: 5.	<i>Conforms to PEFC requirements</i>
			Process	Yes	Inmetro participated as an invited member in the standard develop-	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					ment process together with various stakeholder groups.	
4.	Has the certification standard been drafted to be applied at individual and/or group and/or regional level?	Annex 2, 3.3		Yes	Cerflor standard is applicable at individual and group level (Annex 4).	<i>Conforms to PEFC requirements</i>
5.	Has the development of certification criteria been initiated by national forest owners' organisations or national forestry sector organisations having support of the major forest owners' organisations in that country? ^[1]	Annex 2, 3.4.1	Process	Yes	Initiative for standard development came from the Brazilian Silviculture Society (SBS) which represents private sector and forest owners in Brazil	<i>Conforms to PEFC requirements</i>
6.	Have all relevant interested parties representing the different aspects of sustainable forest management been invited to participate in the standard setting process and a created Forum? ^[1]	Annex 2, 3.4.1	Doc.	Yes	Annexes 9 & 10: ABNT rules of the statute apply (reference to the general rules on transparency, openness based on international procedures). Annex 10: Study Commission (Standard Setting Working Group) consist of representatives: producer, consumer and neutral parties It is the responsibility of President to fairly and equitable maintain the representation class in the CE deliberations.	<i>Conforms to PEFC requirements</i>
			Process	Yes	Annex 11 (List of invited and participating stakeholders) covers well different stakeholder groups. Stakeholder consultations also confirm that the standard development process is seen transparent and stakeholder groups are well represented.	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
7.	Do consensus-building procedures of the Forum provide for balanced representation of interest categories? ^[*2]	Annex 2, 3.4.1	Doc.	Yes	Standard Setting Working Group consists of producer, consumer and neutral party representatives: (Annex 10; 8.1, 8.2 & 11). (Annex 10) 11.6 The meeting(s) for discussion and approval, in the CE, of the Standard Project for National Voting, as well as those of analysis of the National Voting must rely upon a minimum of four members, being obligatory the attendance of at least one member per representation class, the President and the Secretary.	<i>Conforms to PEFC requirements</i>
			Process	Yes	Different interest groups were sufficiently represented in the Study Commission (CE) although social NGO decided not to participate in the standard setting process. In addition the national standard has been sent for national consultation (voting).	<i>Conforms to PEFC requirements</i>
8.	Have the views of all relevant interested parties been documented and considered in an open and transparent way? ^[*3]	Annex 2, 3.4.1	Doc.	Yes	Annex 10; 13.6-13.10 13.6 The National Voting of the Standard Project must be in accordance with 14-07.20.02. 13.7 The acceptance or denial of the technical suggestions or objections is decided among the attended members, who elaborated the text of the Standard Project, and it must comply with the rules set forth in 11.3, 11.4 and 11.6. 13.8 All those who submitted the votes along with suggestions or disapproval of the Standard Project must be	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					invited to attend the meeting(s) of analysis of the voting to clarify their suggestions. 13.9 In case the Study Commission accepts technical objections, it must provide: a) the submission of the second Standard Project to National Voting, when the importance of the introduced alterations is justified; b) the forwarding of the Standard Project, duly modified, to the Secretary of the CB or ONS. 13.10 The Study Commission must set forth the second Standard Project whenever it needs to modify a Standard Project under analysis, by requirement of, for example, suggestions received in National Voting, new legal prescriptions and alteration of international standards regarding the material or proven technical aspects. Upon the elaboration of second Standard Project, it shall be circulated for National Voting.	
			Process	Yes	Summary of meeting minutes (Annex 12) and compilation of votes and comments (Annex 13) show that views of all relevant parties have been documented and considered.	<i>Conforms to PEFC requirements</i>
9.	Has the formal approval of standards been based on evidence of consensus? [³]	Annex 2, 3.4.1	Doc.	Yes	The national voting (consultation) system is described in detail in Annex 14. CE will analyse and take into consideration the national voting before final approval of the standard.	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					Annex 10; paragraph 11 describes the rules for voting and decision making in Study Commission (prefers consensus, if not achieved 75% majority of attending members' votes needed).	
			Process	Yes	During the standard development and revision process the procedures described in the documentation were followed and all decisions were taken in consensus.	Conforms to PEFC requirements (Minutes of the Technical Committee meetings 20/03/2009 & 6/12/2007)
10.	Does the implementation of the consensus based approach comply with Guideline GL 5/2006?	GL 5/2006	Doc.	Yes	The national voting (consultation) system is described in detail in Annex 14 and Study Commission internal rules (Annex 10) comply with the Guideline 5/2006. 11.3 The deliberations of the CE (Study Commission) are taken preferably by consensus or, in case it is not possible, with 75% or more of the attending members votes, including the President. 11.4 During the final deliberations, each attending member shall have the right to vote, under the attendance rate of 30% of the meetings. 11.6 The meeting(s) for discussion and approval, in the CE, of the Standard Project for National Voting, as well as those of analysis of the National Voting must rely upon a minimum of four	<i>Conforms to PEFC requirements</i>
			Process	Yes	The procedures described in the documentation have been fol-	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					lowed in standard development process (based on provided meeting minutes summaries and national voting process description).	
11.	Has the Forum defined its own written procedures which have been made available to interest parties upon request? ^[2]	Annex 2, 3.4.1	Doc.	Yes	Annex 14 (Administrative Instruction Manual, code 07.20.02. – Elaboration of Brazilian Standards) describes in detail the process and procedures for standard development and Annex 10 (Administrative Instruction Manual, code 07.20.07) Study Commission Internal Rules.	<i>Conforms to PEFC requirements</i>
			Process	Yes	Above listed documentation is available at Cerflor/INMETRO website. Stakeholder consultation statements also prove that information on the standard setting process has been made easily available.	<i>Conforms to PEFC requirements</i>
12.	Do the written procedures for standard setting contain an appeal mechanism for impartial handling of any substantive and procedural complaints? ^[2]	Annex2, 3.4.1	Doc.	Yes	Annex 14: 5.5.2.2-5.5.2.5 describes how any interested party may request issuing a technically justified amendment in the standard. Annex 27 describes establishment of a permanent appeals commission which is responsible for standard setting related appeals and complaints.	<i>Conforms to PEFC requirements</i>
			Process	Yes	The practice is similar to all Standardization Bodies but has not used so far in the case of Cerflor system.	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
13.	Has the start of the standard setting process been communicated to the public? ^[*3]	Annex 2, 3.4.2	Doc.	Yes	ABNT Administrative Instructions Manual (see Annex 9: 5.5.1.2) obliges the Study Commission Secretary to set forth the required contacts with feasible participants with a formal invitation letter.	<i>Conforms to PEFC requirements</i>
			Process	Yes	The creation or reactivation of the Study Commission for the development or revision of standards is reported on the home page of ABNT and e-mail interested parties (e-mailing list was attached as an Annex in the application).	<i>Conforms to PEFC requirements</i> <i>Note – e-mailing list was mainly outdated.</i>
14.	Has the information on the development process been distributed and discussed? ^[*3]	Annex 2, 3.4.2	Doc.	Yes	Annex 14 (Administrative Instruction Manual, code 07.20.02. – Elaboration of Brazilian Standards) describes procedures for national consultation and Annex 10 (Administrative Instruction Manual, code 07.20.07 Study Commission Internal Rules) obliges the Study Commission thought its' secretary to carry out the national consultation.	<i>Conforms to PEFC requirements</i>
			Process		ABNT's standard was discussed in a few meetings and distributed to members of the Study Commission. Subsequently, the standard was submitted to a process of national consultation in the ABNT's website for vote and comment for a period of 60 days, as well as an announcement about this consultation was published in the Federal Gazette. After that, the result of the national consultation and the comments re-	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					ceived were analyzed and discussed by the members of the ABNT's Study Commission and the decision to incorporate these comments was taken by consensus. (Annexes 11 & 12).	
15.	Has the final draft standard been available to all interested parties, e.g. by posting it on the Internet? ^[*3]	Annex 2, 3.4.2	Doc.	Yes	Annex 14: 5.2.1 All of the Standard Projects, Standard Review Projects and Amendment Projects shall be submitted to National Voting, with the purpose of supplying the ABNT associates, segments and other interested parties with the voting required to its transformation into a Brazilian standard.	<i>Conforms to PEFC requirements</i>
			Process	Yes	The standards for planted forests consultation was published for national consultation in August 2001 (Annex 16) and for native forests in November 2003 (Annex 17). The revision of the standards for planted forests and Chain of custody were submitted to a process of national consultation in the ABNT's web site in July 21, 2008 (Annex 18), as well as an announcement about this consultation was published in Federal Gazette.	<i>Conforms to PEFC requirements</i>
16.	Has the final draft standard been sent out for formal national consultation process? ^[*3]	Annex 2, 3.4.3	Doc.	Yes	Annex 14: 5.2.1 All of the Standard Projects, Standard Review Projects and Amendment Projects shall be submitted to National Voting, with the purpose of supplying the ABNT associates, segments and other interested parties with the voting required to its transformation into	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					a Brazilian standard.	
			Process	Yes	<p>The standards for planted forests consultation was published for national consultation in August 2001 (Annex 16) and for native forests in November 2003 (Annex 17).</p> <p>The revision of the standards for planted forests and Chain of custody were submitted to a process of national consultation in the ABNT's web site in July 21, 2008 (Annex 18), as well as an announcement about this consultation was published in Federal Gazette.</p>	<i>Conforms to PEFC requirements</i>
17.	Have views of interested parties been discussed? [*3]	Annex 2, 3.4.3	Doc.	Yes	<p>The national voting (consultation) system is described in detail in Annex 14. Study Commission (CE) will analyse and take into consideration the national voting before final approval of the standard.</p> <p>Annex 14: 5.2.4 Once the deadline for the National Voting has ended, the Secretary of the ABNT shall send the Voting Forms to the CB or ONS, so that the voting analysis is performed by the Authoring CE (Study Commission). The authors of the approval votes with technical suggestions or disapproval shall be invited to participate in the meeting(s) of voting analysis.</p>	<i>Conforms to PEFC requirements</i>
			Process	Yes	After receiving the results of national consultation, the result and the comments received were analyzed by the	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					<p>members of the ABNT's Study Commission. The comments considered relevant were incorporated in the standard (Annex 12).</p> <p>The standards ABNT NBR 14791 (Guidelines for forest auditing – General principles) and ABNT NBR 14792 (Guidelines for forest auditing – Audit procedures – Auditing of forest management systems) were cancelled and replaced to ABNT NBR ISO 19011 (Guidelines for quality and/or environmental management systems auditing) (Annex 19).</p> <p>The confirmation's proposed of ABNT NBR 14793 (Guidelines for forest auditing – Qualification criteria for forest auditors) and ABNT NBR 15789 (Forest management – Principles, criteria and indicators for native forest) were submitted to a process of national consultation for vote and comment for a period of 30 days through announcement no. 1/2008 (Annex 20) and no. 7/2009 (Annex 21) respectively, as well as an announcement about this consultation was published in Federal Gazette ("Diário Oficial da União-DOU") and ABNT's Newsletter. As these confirmation's proposals not received technical objections, the ABNT NBR 14793 and 15789 were confirmed</p>	



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					in 25/02/2008 (Annex 22) and 24/07/2009 (Annex 6), respectively. The standards ABNT NBR 16789 (Forest Management — Guidance for the implementation of ABNT NBR 14789) and ABNT NBR 15753 (Forest Management — Guidance for the implementation of ABNT NBR 15789) were submitted to a process of national consultation for 60 days through a Announcement no. 06/2009 (Annex 23). The standards ABNT NBR 15753 was published in 2009/08/14 (Annex 8), and the comments received to ABNT NBR 16789 (Annex 7) are in analyses by the members of the ABNT's Study Commission.	
18.	Has the Forum given general information on the changes made as a result of a consultation process? ^[*3]	Annex 2, 3.4.3	Doc.	Yes	Annex 14:5.2 describes the national voting process: if as a result of the first consultation there are technical objections approved in the Study Commission, the second standard will also be sent out for national consultation. In case of an amendment made in Cerflor standard, the ABNT Secretary will publish and forward an amendment as described in Annex 14:5.5.2.9.	<i>Conforms to PEFC requirements</i>
			Process	Yes	Procedures described in the documentation have been followed in the standard development. The changes made as a result of national consultation in the case of the confirmation's proposed	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					<p>of ABNT NBR 14793 (Guidelines for forest auditing – Qualification criteria for forest auditors) and ABNT NBR 15789 (Forest management – Principles, criteria and indicators for native forest) were submitted to a process of national consultation for vote and comment for a period of 30 days through announcement no. 1/2008 (Annex 20) and no. 7/2009 (Annex 21) respectively, as well as an announcement about this consultation was published in Federal Gazette (“Diário Oficial da União-DOU”) and ABNT’s Newsletter. As these confirmation’s proposals not received technical objections, the ABNT NBR 14793 and 15789 were confirmed in 25/02/2008 (Annex 22) and 24/07/2009 (Annex 6), respectively. The standards ABNT NBR 16789 (Forest Management — Guidance for the implementation of ABNT NBR 14789) and ABNT NBR 15753 (Forest Management — Guidance for the implementation of ABNT NBR 15789) were submitted to a process of national consultation for 60 days through a Announcement no. 06/2009 (Annex 23). The standards ABNT NBR 15753 was published in 2009/08/14 (Annex 8), and the comments received to ABNT NBR 16789 (Annex 7) are in analyses</p>	



No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					by the members of the ABNT's Study Commission.	
19.	Had the consultation been at least 60 days? [³]	Annex 2, 3.4.3	Doc.	Yes	Annex 14: 5.2.3 sets the consultation period which lasts at least 60 days.	<i>Conforms to PEFC requirements</i>
			Process	No	The consultation period has been at least 60 days in the case of first consultation. In the standard revision process no changes were made to the Standard for Native Forests and the consultation period has been only 30 days. (Annex 21).	Does not conform to PEFC requirements. Comment: Principles, criteria and indicators for native forests were submitted to a process of national consultation for vote and comment for a period of 30 days. General ABNT procedure is to reduce public consultation period in case that the Technical Committee receives no comments or revision requests.
Standards for chain of custody certification (only if the scheme includes a scheme specific C-o-C standard)						
20.	<i>Has the development of certification standards been independent from the certification and accreditation process? [⁴]</i>	Annex 2, 4.1	Doc.		<i>Concerning the Chain of Custody standard it was adopted the PEFC Technical Documentation - Annex 4 (Chain of Custody of Forest Based Products – Requirements) as part of CERFLOR Scheme – NBR14790.</i>	<i>Conforms to PEFC requirements</i>
			Process			<i>Conforms to PEFC requirements</i>
21.	Has the process of development of national or sub-national chain of custody requirements been supported by the PEFC National Governing Body? [⁴]	Annex 2, 4.2.1	Process		ABNT NBR 14790 is based on document PEFC – Chain of custody of forest based products – Requirements. Inmetro is the PEFC's national Governing body in Brazil and recognizes ABNT as the national standardization body and (Res 07, August 24, 1992: 5).	<i>Conforms to PEFC requirements</i>
22.	Have all relevant interested parties representing different aspects of sustainable forest management, wood procure-	Annex 2, 4.2.1	Doc.		Annexes 9 & 10: ABNT rules of the statute apply (reference to the general rules on transparency, openness based on international procedures). Annex	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
	ment, processing and retailing been invited to participate in the standard setting process? [*4]				10: CE consist of representatives: producer, consumer and neutral parties It is the responsibility of President to fairly and equitable maintain the representation class in the CE deliberations.	
			Process		Annex 11 (List of invited and participating stakeholders) covers well different stakeholder groups. Stakeholder consultations also confirm that the standard development process is seen transparent and stakeholder groups are well represented.	<i>Conforms to PEFC requirements</i>
23.	Do consensus-building procedures of the Forum provide for balance representation of interest categories? [*6]	Annex 2, 4.2.1	Doc.		CE consists of representatives: producer, consumer and neutral parties (Annex 10; 8.1, 8.2 & 11).	<i>Conforms to PEFC requirements</i>
			Process		Different interest groups were sufficiently represented in the Study Commission (CE) although social NGO decided not to participate in the standard setting process. In addition the national standard has been sent for national consultation (voting).	<i>Conforms to PEFC requirements</i>
24.	Have the views of all relevant interested parties been documented and considered in an open and transparent way? [*5]	Annex 2, 4.2.1, 4.2.3	Doc.		Annex 10; 13.6-13.10	<i>Conforms to PEFC requirements</i>
			Process		Summary of meeting minutes (Annex 12) and compilation of votes and comments (Annex 13) show that views of all relevant parties have been documented and considered.	<i>Conforms to PEFC requirements</i>
25.	Has the formal approval of standards been based on evidence of consensus? [*5]	Annex 2, 4.2.1	Doc.		The national voting (consultation) system is described in detail in Annex 14. CE will analyse and take into consideration the national voting before final approval of the standard. Annex 10; paragraph 11 describes the rules for voting and decision making in Study Commission (prefers consensus, if not achieved 75% majority of attending members' votes needed).	<i>Conforms to PEFC requirements Minutes of the Technical Committee meetings (20/03/2009 & 6/12/2007)</i>
			Process		During the standard development and revision process the	<i>Conforms to PEFC require-</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					procedures described in the documentation were followed and all decisions were taken in consensus.	<i>ments</i>
26.	Does the implementation of the consensus based approach comply with Guideline GL 5/2006	GL 5/2006	Doc.		The national voting (consultation) system is described in detail in Annex 14 and Study Commission internal rules (Annex 10) comply with the Guideline 5/2006.	<i>Conforms to PEFC requirements</i>
			Process		The procedures described in the documentation have been followed in standard development process (based on provided meeting minutes summaries and national voting process description).	<i>Conforms to PEFC requirements</i>
27.	Has the Forum defined its own written procedures which have been made available to interest parties upon request? [*6]	Annex 2, 4.2.1	Doc.		Annex 14 (Administrative Instruction Manual, code 07.20.02. – Elaboration of Brazilian Standards) describes in detail the process and procedures for standard development and Annex 10 (Administrative Instruction Manual, code 07.20.07) Study Commission Internal Rules.	<i>Conforms to PEFC requirements</i>
			Process		Above listed documentation is available at Cerflor/INMETRO website.	<i>Conforms to PEFC requirements</i>
28.	Do the written procedures for standard setting contain an appeal mechanism for impartial handling of any substantive and procedural complaints? [*6]	Annex 2, 4.2.1	Doc.		Annex 14: 5.5.2.2-5.5.2.5 describes how any interested party may request issuing a technically justified amendment in the standard. Annex 27 describes establishment of a permanent appeals commission which is responsible for standard setting related appeals and complaints.	<i>Conforms to PEFC requirements</i>
			Process		The practice is similar to all Standardization Bodies but has not used so far in the case of Cerflor system.	<i>Conforms to PEFC requirements</i>
29.	Has the start of the standard setting process been communicated to the public? [*5]	Annex 2, 4.2.2	Doc.		Annex 9: 5.5.1.2 – obliges the Study Commission Secretary to set forth the required contacts with feasible participants with a formal invitation letter.	<i>Conforms to PEFC requirements</i>
			Process		The creation or reactivation of the Study Commission for the development or revision of standards is reported on the	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					home page of ABNT and e-mail interested parties (e-mailing list as an Annex).	<i>Comment: Note that the e-mailing list was mainly outdated.</i>
30.	Has the information on the development process been distributed and discussed? [*5]	Annex 2, 4.2.2	Doc.		Annex 14 (Administrative Instruction Manual, code 07.20.02. – Elaboration of Brazilian Standards) describes procedures for national consultation and Annex 10 (Administrative Instruction Manual, code 07.20.07 Study Commission Internal Rules) obliges the Study Commission thought its secretary to carry out the national consultation.	
			Process		ABNT's standard was discussed in a few meetings and distributed to members of the Study Commission. Subsequently, the standard was submitted to a process of national consultation in the ABNT's website for vote and comment for a period of 60 days, as well as an announcement about this consultation was published in the Federal Gazette. After that, the result of the national consultation and the comments received were analyzed and discussed by the members of the ABNT's Study Commission and the decision to incorporate these comments was taken by consensus. (Annexes 11 & 12).	<i>Conforms to PEFC requirements</i>
31.	Has the final draft standard been available to all interested parties, e.g. by posting it on the Internet? [*5]	Annex 2, 4.2.2	Doc.		Annex 14: 5.2.1 All of the Standard Projects, Standard Review Projects and Amendment Projects shall be submitted to National Voting, with the purpose of supplying the ABNT associates, segments and other interested parties with the voting required to its transformation into a Brazilian standard.	<i>Conforms to PEFC requirements</i>
			Process		The standards for planted forests consultation was published for national consultation in August 2001 (Annex 16) and for native forests in November 2003 (Annex 17).	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					The revision of the standards for planted forests and Chain of custody were submitted to a process of national consultation in the ABNT's web site in July 21, 2008 (Annex 18), as well as an announcement about this consultation was published in Federal Gazette.	
32.	Has the final draft standard been sent out for a formal national consultation process? [*5]	Annex 2, 4.2.3	Doc.		Annex 14: 5.2.1 All of the Standard Projects, Standard Review Projects and Amendment Projects shall be submitted to National Voting, with the purpose of supplying the ABNT associates, segments and other interested parties with the voting required to its transformation into a Brazilian standard.	<i>Conforms to PEFC requirements</i>
			Process		The standards for planted forests consultation was published for national consultation in August 2001 (Annex 16) and for native forests in November 2003 (Annex 17). The revision of the standards for planted forests and Chain of custody were submitted to a process of national consultation in the ABNT's web site in July 21, 2008 (Annex 18), as well as an announcement about this consultation was published in Federal Gazette.	<i>Conforms to PEFC requirements</i>
33.	Has the Forum given general information on the changes made as a result of a consultation process? [*5]	Annex 2, 4.2.3	Doc.		Annex 14:5.2 describes the national voting process: if as a result of the first consultation there are technical objections approved in the Study Commission, the second standard will also be sent out for national consultation. In case of an amendment made in Cerflor standard, the ABNT Secretary will publish and forward an amendment as described in Annex 14:5.5.2.9.	<i>Conforms to PEFC requirements</i>
			Process		Procedures described in the documentation have been followed in the standard development.	<i>Conforms to PEFC requirements</i>
34.	Had the consultation period been at least 60 days	Annex 2, 4.2.3	Doc.		Annex 14: 5.2.3 sets the consultation period which lasts at least	<i>Conforms to PEFC require-</i>



No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
	long? [*5]			60 days.		<i>ments</i>
			Process		Cerflor scheme has adopted the PEFC international standard for chain of custody verification.	<i>Not applicable</i>
Pilot testing						
35.	Have the first results on the testing of the final drafts for national/sub-national forest certification standards and their implementation arrangements been available prior to submission of the scheme for the PEFC Council endorsement and mutual recognition? [7]	Annex 2, 5	Doc.	n.a	ABNT – Work Instruction, Code IT/NOR-002 gives precise instructions on field testing.	Not a relevant requirement in standard revisions, as it can be replaced with the experiences gained from the previous standard – This was a revision for all standards.
			Process	n.a	Annex 26 includes documentation of the Cerflor field testing for the initial Cerflor standard approval.	Not a relevant requirement in standard revisions, as it can be replaced with the experiences gained from the previous standard.
36.	Has appropriate action been taken to incorporate improvements and recommendations prior to submission of the scheme for the PEFC Council endorsement and mutual recognition process? [7]	Annex 2, 5	Doc.	Yes	ABNT – Work Instruction, Code IT/NOR-002 4.4 After the field-testing performance of the Brazilian Standard project, it must be guaranteed that its results were implemented into the project, when applicable.	<i>Conforms to PEFC requirements</i>
			Process	n.a		In the revision process the standard need not to be tested
Review of standards						
37.	Have the standards on forest and chain of custody certifications been reviewed at least every 5 years or is it foreseen to review these standards at least every 5 years?	Annex 2, 6.1	Doc.	No	Administrative Instruction Manual Code 07.20.02 (Annex 14) establishes the review process as the responsibility of the Study Commission (CE) and its secretary (ABNT). The frequency of the review is based on ISO Supplement – Procedures specific to ISO 2001 – item 2.9 – Maintenance of standards	<i>Does not conform to PEFC requirement</i>



No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					but the frequency is not mentioned in the actual Cerflor standard documentation.	
			Process	Yes	The first standard was endorsed in 19 October 2005 (valid until 19 October 2010) and the reviewed standard was submitted for assessment in 15 January 2010.	Conforms to PEFC requirements
38.	Does the scheme documentation indicate which organisation is responsible to initiate the revision work?	Annex 2, 6.1	Doc.	Yes	Administrative Instruction Manual Code 07.20.02 (Annex 14) establishes the review process as the responsibility of the Study Commission (CE) and its Secretary (ABNT).	Conforms to PEFC requirements
39.	Has the revision procedures been participatory, fair and transparent? ^[*8]	Annex 2, 6.1	Process	Yes	Similar procedures as in the first standard development have been followed (see items 6-10) – the process has been participatory, fair and transparent.	Conforms to PEFC requirements
40.	Has the PEFC National Governing Body appropriately considered the revisions of the general PEFC requirements for standard setting and implementation in the national standards? ^[*8]	Annex 2, 6.2	Doc.	Yes	ABNT general rules for standard setting are applicable and have been applied for CERFLOR standard development and revision as well. No specific reference to PEFC requirement revisions is made in the scheme documentation. Annex 14: 5.6 Revision of Brazilian standards 5.6.1 The Revision of a Brazilian Standard shall be set forth: a) to comply with legal impositions; b) by statutory disposition; c) by technological upgrade requirements; d) to be compatible with international, regional or foreign Standards when ap-	Conforms to PEFC requirements



Indufor

Annex 1

No	Question	Reference to PEFC Council doc.	Assess. basis*	YES/ NO*	Reference to application documents	Consultant comments
					<p>appropriate; e) to comply with the new circumstances resulting from situations of security, health, environment, etc. Note: A Brazilian Standard shall be revised, at least, each 10 years after its ratification; when this period has expired, the ABNT shall forward it to the respective CB or ONS.</p>	
41.	Has the PEFC National Governing Body indicated to the PEFC Council the appropriate considerations of the revisions induced by the PEFC Council in national standards? ^[8]	Annex 2, 6.2	Process	Yes	<p>ABNT has revised the Cerflor standard's in order to incorporate the PEFC requirements into the standards (for example, the revision of ABNT NBR 14790 to add the Appendix 7 and 8 of Annex 4 – Chain of Custody). It intends to indicate to the PEFC Council the appropriate considerations of the revisions induced by the PEFC Council in national standards in future revisions if it modifies the content of the Cerflor standards.</p>	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

PART II: MINIMUM REQUIREMENTS CHECKLIST FOR CERTIFICATION SCHEMES AND THEIR IMPLEMENTATION (ANNEX 3)

1 SCOPE

Part II covers requirements for certification schemes and their implementation given in Annex 3 of the PEFC Council Technical Document (*Basis for certification schemes and their implementation*).

2 CHECKLIST

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
General requirements for certification criteria					
1.	Are the criteria relevant to all types of forests and management systems, which exist in the nation/region they have been elaborated for?	Annex 3, 3.6	Yes	Cerflor system includes standards for planted forests and for native forests (Annexes 5 & 6).	<i>Conforms to PEFC requirements</i>
2.	Do the criteria clearly express the objectives for forest management that can be unambiguously verified by different auditors?	Annex 3, 3.6	Yes	Cerflor standards express objectives for native forest and plantation forest management through principles, criteria and indicators. INMETRO documents also include criteria for forest management certification body (NIT-DICOR-053) and Forest Audit Guidance Documents – Audit Procedures – Forest Auditors Qualification Criteria (NBR 14793:2001).	<i>Conforms to PEFC requirements</i>
3.	Are management and performance requirements applicable at the level of a forest management unit?	Annex 3, 3.6	Yes	Annex 4: 8.1 The certification aims at indicating the existence of adequate levels of trust that one unit or area of management of forest or forest producer group is on compliance to the NBR14789 (Principles, criteria and indicators for planted forest) or to the NBR 15789 (Principles, criteria and indicators for native forests).	<i>Conforms to PEFC requirements</i>
4.	Are management and performance requirements applicable optionally also at group and regional levels? [*1]	Annex 3, 3.6	Yes	The NIT – Dicor 053 (Additional Criteria for Forest Management Certification Body) – Annex A (in Annex 4) specifically deals with the certification of a group of forest owners. Cerflor does not contain specific requirements for regional certification; all of the requirements are applicable at a national level.	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
5.	<p>Does the scheme require that property rights and land tenure arrangements shall be clearly defined, documented and established for the relevant forest area?*</p> <p><i>The requirement is added to the PEFC checklist in February 2010, and was not in force when Inmetro applied for the endorsement.</i></p>	Annex 3, 3.5	Yes	<p>Forest management standards require legal compliance including ownership issues. Principle 1, C 1.2 also requires documentation of property rights and land tenure</p> <p>P1, C1.2 c) existence of a land tenure or land use document which proves the demarcation of the forest management unit and which is consistent with the management plan;</p>	Conforms to PEFC requirements
6.	<p>Does the scheme require the clarification, recognition and respect of legal, customary and traditional rights related to the forest land in compliance with chapter 3.5 of Annex?</p> <p><i>The requirement is added to the PEFC checklist in February 2010, and was not in force when INMETRO applied for the Cerflor endorsement.</i></p>	Annex 3, 3.5	Yes	<p>P1, C 1.2 The rights of local communities to use and occupy land with natural forests must be respected, according to the law in force. Indicators: a) evidences that the legal and traditional non-predatory rights of the local communities are being respected; b) evidences that areas neighboring or contiguous to the forest management unit, where local communities are living, are identified and respected; c) existence of a land tenure or land use document which proves the demarcation of the forest management unit and which is consistent with the management plan; and</p>	Conforms to PEFC requirements
7.	<p>Does the scheme require that a summary of the forest management plan or its equivalent, which contains information about the forest management measures to be applied, is publicly available, except for confidential business and personal information?</p> <p><i>The requirement is added to the PEFC checklist in February 2010, and was not in force when INMETRO applied for the Cerflor endorsement.</i></p>	Annex 3, 3.5	Yes	<p>Planted Forests: P5, C 5.2 The organization shall implement dissemination and communication programs for stakeholders. Indicators: a) existence of procedures or instruments for clearly and objectively disseminating information regarding activities and means of operation of the forestry enterprise; Native Forests: P5, C 5.2 - The organization shall implant programs of dissemination and communication with the interested parties. Indicators: a) existence of procedures and</p>	Conforms to PEFC requirements



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
				instruments for clear and objective dissemination of the activities and forms of action of the forest enterprise;	
8.	Are the national certification criteria in compliance with national laws programmes and policies?	Annex 3, 3.2, 3.6	Yes	Both the standard for natural forests (Annex 6: ABNT NBR 15789 - Principle 1) and for plantations (Annex 5: Principle 1 ABNT NBR 14789) require that the forestry enterprise shall be managed by employing attitudes and actions that ensure compliance with current Federal, State and Municipal legislation. The Brazilian Government, through the Ministry of Development, Industry and Foreign Trade (MDIC) and the Ministry of the Environment (MMA), has supported the development of a national forest certification program.	<i>Conforms to PEFC requirements</i>
9.	Are the references to national laws, programs and policies indicated in the scheme documentation when relevant, e.g., if the requirement of the PEOLG is not addressed in the certification criteria but is included in normative regulations?	Annex 3, 3.6	Yes	ABNT NBR 14789 - Principle 1 (Annex 5) 3.1.1 Criterion 1.1 and ABNT NBR 15789 - Principle 1 (Annex 6) 4.1.1 Criterion 1.1 require existing mechanism to identify applicable laws and regulation	<i>Conforms to PEFC requirements</i>
10.	Does the scheme include the requirement that any apparent violation of the legislation shall be taken into consideration in internal and external audits?	Annex 3, 3.2	Yes	ABNT NBR 14789 - Principle 1 (Annex 5) 3.1.1 Criterion 1.1 and ABNT NBR 15789 - Principle 1 (Annex 6) 4.1.1 Criterion 1.1 require existing mechanism to identify applicable laws and regulations and also require proves of fulfillment of such laws.	<i>Conforms to PEFC requirements</i>
ILO Conventions					
11.	Are the Fundamental ILO Conventions ratified by the country and implemented through the legislative framework?	Annex 3, 3.3	Yes	Brazil has already ratified the ILO Conventions and implemented them through the legislative framework.	<i>Conforms to PEFC requirements</i>
12.	Do the national certification criteria address the core elements of those Fundamental ILO Conventions, which have been not	Annex 3, 3.3	n.a.	Brazil has already ratified the ILO Conventions and implemented them through the legislative framework.	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
	ratified by the country?				
13.	Has the ILO Code of Practice on Safety and Health in Forestry Work been considered in development of national and regional certification criteria.	Annex 3, 3.3	Yes	ABNT NBR 14789 – Principle 1 – Criterion 1.3; Principle 2 – Criterion 2.2 – item “f”: f) evidence of the implementation of training and capacity building programs aimed at: — professional workers capacitation, — reduction in the number of work-related accidents, — decrease of occurrences placing the integrity of ecosystems at risk. (Annex 5) ABNT NBR 15789-Principle 1 (Annex 6).	<i>Conforms to PEFC requirements</i>
Other international conventions					
14.	Are the international conventions relevant to forest management and ratified by the country respected through the legislative framework?	Annex 3, 3.4	Yes	ABNT NBR 14789 - Principle 1 – Criterion 1.1. (Annex 5) ABNT NBR 15789 - Principle 1 – Criterion 1.1. (Annex 6) The organization must undertake the pertinent activities for establishing and managing forests in accordance with current legislation and other forest and environmental regulations applicable.	<i>Conforms to PEFC requirements</i>
15.	Are the requirements agreed upon in the conventions, even if they are not ratified by the country, respected in the certification criteria to the degree that they are covered in PEOLG or other reference documents basis approved by the PEFC Council?	Annex 3, 3.4	Yes	Brazil has ratified all the international conventions listed in the PEFC TD Annex 3, item 3.4. Both Cerflor standard for native forests and standard for plantation forests require legal compliance ([Principle 1 (in Annexes 5 & 6).	<i>Conforms to PEFC requirements</i>
Level of application – general					
16.	Are the applicants, the certified areas and participating forest owners/managers/others actors clearly identified in the scheme documentation	Annex 3, 4.1	Yes	Annex 4 (NIT-DICOR-053: 9.4.6 and Annex A & B) guides identification of certified area and participating owners.	Strictly speaking this document sets “Additional Criteria for Forest Management Certification Body”. It is recommended that this requirement would be available through a document more obvious from the applicants’ point of view. The forest management and CoC standards



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
					or their implementation guidelines do not directly specify applicant. <i>Conforms to PEFC requirements</i>
17.	Does the scheme documentation require that all actors involved in or operating on the certified area comply with the certification requirements?	Annex 3, 4.1	Yes	<p>Annex 4 (Annex A: A-1 and A-2) requires in group certification all forest producers must individually comply with certification requirements.</p> <p>The NIT – Dicor 053 – item 9.4.1, (Annex 4) establishes that the organizations must have a <u>descriptive document presenting what has been done to satisfy the Brazilian standards</u> ABNT NBR 14789 (Annex 5) and ABNT NBR 15789 (Annex 6) and the <u>commitments have been made for satisfying certification. This is extended to all players involved in the management of the areas to be certified.</u></p> <p>NIT-Dicor 053 – Annex A, item A-5 (Annex 4) states that the forest producer group is responsible for applying and monitoring the requirements established in the standard, <u>as well as responsible for establishing procedures that ensure that every participant of the certified group fill in and execute their duties</u>, and for informing the participants and the interested parties about their rights and obligations before the certification.</p>	<i>Conforms to PEFC requirements</i>
18.	Does the scheme documentation require that all actors individually certified or participating in regional/group certification are responsible for ensuring that contractors' activities and operations meet the respective forest management criteria?	Annex 3, 4.1	Yes	<p>In standard ABNT NBR 14789 (plantation forests) – Principle 2 – “The <u>organization</u> must promote and <u>adopt attitudes that encourage the rational use of forest resources</u>, both with regard to raw materials produced, secondary products and services rendered by the forest.” (Annex 5).</p> <p>In ABNT NBR 15789 (native forests) – Principle 2 – “Forest management shall be planned and executed, through the orga-</p>	<i>Conforms to PEFC requirements</i>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
				<p>organisation's own services or by means of third parties. <u>The organisation shall show and present attitudes that lead to the sustainable use of resources and services offered by the forest.</u>" (Annex 6)</p> <p>The NIT – Dicor 053 – item 9.4.1, (Annex 4) establishes that the organizations must have a <u>descriptive document</u> presenting what has been done to satisfy the Brazilian standards ABNT NBR 14789 (Annex 5) and ABNT NBR 15789 (Annex 6) and the <u>commitments have been made for satisfying certification. This is extended to all players involved in the management of the areas to be certified.</u></p> <p>***</p> <p>NIT-Dicor 053 – Annex A, item A-5 (Annex 4) states that the forest producer group is responsible for applying and monitoring the requirements established in the standard, <u>as well as responsible for establishing procedures that ensure that every participant of the certified group fill in and execute their duties, and for informing the participants and the interested parties about their rights and obligations before the certification.</u></p>	
Level of application – regional certification (only for schemes which include regional certification)					
19.	Does the national definition of regional certification comply with the PEFC Council definition?	Annex 3, 4.1, a			N.a.
20.	Does the forest certification standard include criteria for the regional and also for forest management unit level?	Annex 3, 4.1, a	n.a.		N.a.
21.	Does the scheme documentation require that the assessment of the certification criteria defined for the regional level covers the whole region to be certified?	Annex 3, 4.1, a			N.a.



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
Level of application – group certification (only for schemes which include group certification)					
22.	Does the national definition for group certification comply with the PEFC Council definition?	Annex 3, 4.1 b	Yes	The definition complies with PEFC document but is given in NIT-Dicor 053 – item 7.2 (definitions) and Annex A (Annex 4 “Additional criteria for forest management certification body on compliance to NBR 14789 and/or the NBR 15789”).	Strictly speaking this document sets “Additional Criteria for Forest Management Certification Body”. It is recommended that this requirement would be available through a document more obvious from the applicants’ point of view. The forest management and CoC standards or their implementation guidelines do not directly specify applicant. <i>Conforms to PEFC requirement</i>
23.	Does the scheme documentation clearly define who the applicant is for group certification?	Annex 3, 4.1 b	Yes	Scheme documentation defines the applicant for group certification but the definition is given in NIT-Dicor 053 – Annex A, item A-1. (Annex 4 “Additional criteria for forest management certification body on compliance to NBR 14789 and/or the NBR 15789”).	Strictly speaking this document sets “Additional Criteria for Forest Management Certification Body”. It is recommended that this requirement would be available through a document more obvious from the applicants’ point of view. The forest management and CoC standards or their implementation guidelines do not directly specify applicant. <i>Conforms to PEFC requirement</i>
24.	Does the scheme documentation describe the applicant’s responsibility to assure the compliance of all participants with the certification requirements?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 – Annex A, item A-5 (Annex 4) states that the forest producer group is responsible for applying and monitoring the requirements established in the standard, <u>as well as responsible for establishing procedures that ensure that every participant</u>	<i>Conforms to PEFC requirement</i>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
				of the certified group fill in and execute their duties, and for informing the participants and the interested parties about their rights and obligations before the certification.	
25.	Does the scheme documentation describe the applicant's responsibility to ensure that credible registers are kept of participants to certification and certified forest area?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 – Annex A, item A-2 (Annex 4) requires that every forest producer group must meet the certification requirements individually. A single certification must be issued on behalf of this group, identifying every forest management unit or area belonging to individuals or organizations. The paragraph A-5 requires that the <u>forest producer group will keep forest area records, including owner and UMF or AMF identification under certified forest management state</u> ; and immediately inform the OCF as of inclusion or exclusion of any member.	<i>Conforms to PEFC requirement</i>
26.	Does the scheme documentation describe the applicant's responsibility to implement the rules for group certification?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 – Annex A, item A-5 (Annex 4). The forest producer group is responsible for informing the participants and the interested parties about their rights and obligations before the certification and for clearly describing the responsibility sharing among forest producer group and its members. The forest producer groups shall also demonstrate that the responsibility towards the implementation of the NBR 14789 or the NBR 15789 was discussed among all forest producer group members.	<i>Conforms to PEFC requirement</i>
27.	Does the scheme documentation require that total forest area participating in group certification is recorded?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 – Annex A, item A-2 (Annex 4) .The paragraph A-5 requires that the <u>forest producer group will keep forest area records, including owner and UMF or AMF identification under certified forest management state</u> ; The applicant must be the entity incorporated under the law and a single certification must be issued on behalf of this group, identifying every forest manage-	<i>Conforms to PEFC requirement</i>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
				ment unit or area. (Annex 4:NIT-Dicor 053 – Annex A, item A-1 & A-2)	
28.	Does the scheme documentation describe that forest owners should submit all the forest area under his management in the catchment area for the group certification? (<i>not obligatory to be met but should be aimed at</i>)	Annex 3, 4.1 b	No	NIT-Dicor 053 - 8.1 and Annex A, item A-5.c (Annex 4). A-5 c) The forest producer group is responsible for keeping forest area records, including identification of the owners and units or areas with certified forest management.	<i>Does not conform to PEFC requirement</i>
29.	Does the scheme documentation define the responsibilities and authorities of the applicant and participating forest owners/managers for the inclusion of new participants and to inform the certification body thereof?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 - 8.1 and Annex A, item A-5. (Annex 4) The forest producer group is responsible for e) demonstrate the written agreement of the new group member with the commitments taken before OCF, as of the command or possession change of a certain individual or organization that constitutes the certified group; f) clearly describe the responsibility sharing among forest producer group and its members; g) demonstrate that the responsibility towards the implementation of the NBR 14789 or the NBR 15789 was discussed among all forest producer group members.	<i>Conforms to PEFC requirement</i>
30.	Does the scheme documentation define the responsibilities and authorities of the applicant and participating forest owners/managers for the internal control of conformity and follow up corrective and/or preventive measures?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 – Annex A – A-5 (Annex 4). A-5 The forest producer group is responsible for applying and monitoring the requirements established in the NBR 14789 or the NBR 15789, as well as: a) establish procedures that ensure that every participant of the certified group fill in and execute their duties, by taking into account the requirements established in the NBR 14789 or in the NBR 15789; b) inform the participants and the interested parties about their rights and obligations before	<i>Conforms to PEFC requirement</i>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
				<p>the certification;</p> <p>e) demonstrate the written agreement of the new group member with the commitments taken before OCF, as of the command or possession change of a certain individual or organization that constitutes the certified group;</p> <p>f) clearly describe the responsibility sharing among forest producer group and its members;</p> <p>g) demonstrate that the responsibility towards the implementation of the NBR 14789 or the NBR 15789 was discussed among all forest producer group members.</p>	
31.	Does the scheme documentation describe that the forest management certificate is issued to the applicant (certificate holder)?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 – Annex A., A-2. (Annex 4): Every forest producer group must meet the certification requirements individually. A single certification must be issued in behalf of this group, identifying every forest management unit or area belonging to individuals or organizations. Certifications copies may be provided for the group members by OCF.	<i>Conforms to PEFC requirement</i>
32.	Does the scheme documentation describe that participants in group certification shall receive either a copy of the group certificate including the appendix (when applicable) listing all participating forest owners or an individual attestation issued by the certification body or the applicant which refers to the main certificate?	Annex 3, 4.1 b	Yes	NIT-Dicor 053 – Annex A., A-2. (Annex 4): Certifications copies shall be provided for the group members by OCF (certification body).	<i>Conforms to PEFC requirement</i>
Level of application – individual certification (only for schemes which include individual certification)					
33.	Does the scheme documentation describe that forest owner should submit all the forest area under his management in the catchment area of the certification scheme in the	Annex 3, 4.1 c	Yes	NIT-Dicor 053 - 8.1 (Annex 4): The certification aims at indicating the existence of adequate levels of trust that one unit or area of management of forest or forest producer group is on compliance to the NBR14789 or	<i>Conforms to PEFC requirement</i>



No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
	certification? (<i>not obligatory to be met but should be aimed at</i>)			to the NBR 15789.	
Implementation of changes to the scheme					
34.	Does the scheme documentation define transition period(s) for implementation of changes to the endorsed scheme in compliance with chapter 5 of Annex 3. (<i>This is not applicable to the initial endorsement of a scheme</i>)	Annex 3, 5	Yes	Transition period is regulated by ABNT NBR ISO/IEC 17021, item 8.6.2.	<i>Conforms to PEFC requirement</i>
Appeals, complaints and dispute procedures					
35.	Has the PEFC National Governing Body set up or appointed an impartial and independent dispute settlement body on a permanent basis or does it have written procedures for the establishment of a dispute settlement body on an ad hoc basis?	Annex 3, 6.1	Yes	As part of the Brazilian Conformity Assessment System - SBAC, Cerflor uses its permanent structure for its different levels of activity (1st, 2 nd and 3rd levels) to deal with complaints and appeals, which are established in Conmetro Resolution No. 04/03, of 12/10/03 (Annex 27). Besides, the System - SBAC contains procedures based upon ISO 17021, ISO Guide 65 and internal standard NIE-Cgcre 006 (Annex 28), which furthermore establishes that the Certification Bodies must have procedures to resolve conflicts.	<i>Conforms to PEFC requirement</i>
36.	Has the PEFC National Governing Body established and have documented procedures for an independent dispute settlement body, either permanent or ad hoc, that takes care of those complaints arising from forest management or chain of custody scheme implementation that cannot be addressed in the dispute settlement procedures of the relevant certification or accreditation body?	Annex 3, 6.1	Yes	As part of the Brazilian Conformity Assessment System - SBAC, Cerflor uses SBAC mechanisms for resolving conflicts, ranging from the Accredited Certification Body itself through the Quality Board or Inmetro's General Accrediting Board, hence to the Inmetro Office of the President and finally the Inmetro Permanent Appeals Commission.	<i>Conforms to PEFC requirement</i>
37.	Can the dispute settlement body also resolve possible grievances in chain of custody certification that do not exclusively concern an	Annex 3, 6.1	Yes	Brazilian Conformity Assessment System – SBAC appeals mechanism may settle also possible grievances in chain of custody certification that do not exclu-	<i>Conforms to PEFC requirement</i>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation	Consultant comments
	applicant and a certification body?			sively concern an applicant and a certification body (Annex 27)	
38.	Does the scheme documentation require that the accredited certification body has procedures for dispute settlement for all grievances between the applicant and the certification body?	Annex 3, 6.2	Yes	Brazilian Conformity Assessment System – SBAC requires that a certification body has a Quality Board which is responsible for dispute settlement (Annex 27).	<i>Conforms to PEFC requirement</i>
39.	Does the scheme documentation require that the relevant accreditation body, whose accreditation covers the certification, deals with disputes and complaints concerning observance of the accreditation requirements?	Annex 3, 6.2	Yes	Standard NIT-Dicor 053 (Annex 4) establishes that the Certification Bodies for SFM have procedures for the resolution of conflicts that are based upon ISO 17021, item 8.6.1 “f”. The Standard NIT-Dicor 024 (Annex 29) states that the Certification Bodies for CoC shall act in accordance to the requirements established by ISO/IEC 65 Guide, item 8.1.	<i>Conforms to PEFC requirement</i>

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

[*1] This requirement is applicable only when a national scheme includes rules for regional and/or group forest management certification.



Indufor

Annex 1

PART V: MINIMUM REQUIREMENTS CHECKLIST FOR SCHEME COMPLIANCE WITH ITTO GUIDELINES (ANNEX 3, CHAPTER 4.4)

3 SCOPE

Part V includes requirements for certification criteria (forest management standards) for forest management of natural tropical forests and planted tropical forests for schemes developed in ITTO member producing countries except those which are covered by ATO / ITTO PCI (as per Part IV).

Requirements for criteria for forest management of natural tropical forests

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
Basis for development of criteria for forest management of natural tropical forests – compatibility with ITTO guidelines on the sustainable forest management of natural tropical forests (1992) ^{[*1], [*2], [*3]}				
Policy and legislation				
1.	National Forest Inventory	Principle 4	Yes	ABNT NBR 15789 - P2, C2.2.i (Annex 6). Forest management shall be backed by sustainable forest management plans - indicator - existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest
2.		Principle 5	Yes	ABNT NBR 15789 - P2, C2.2.g (Annex 6). “evidence that the forest management plan is monitored and revised by a legally licensed professional, incorporating the surveillance results”
3.	Permanent Forest Estate	Principle 6	Yes	ABNT NBR 15789 - P1, C1.1.b, P3, C3.3.c, C3.3.e (Annex 6). b) existence of records that prove fulfillment of legislation and of other regulations applicable to the activities carried out in the forest management area. c) existence of mapping, demarcation and protection of historic, archaeological sites of cultural or social value; e) existence of clear definition, mapping, and documentation of the permanent preservation areas and of the legal reserve , within the forest management area.
4.		Principle 7	Yes	ABNT NBR 15789 - P1, C1.1.b, P3, C3.3.c, C3.3.e, C3.3.d (Annex 6). b) existence of records that prove fulfillment of legislation and of other regulations applicable to the activities carried out in the forest management area. c) existence of mapping, demarcation and protection of historic, archaeological sites of cultural or social value; d) identification of the existing conservation units in the influence area of the enterprise; e) existence of clear definition, mapping, and documentation of the permanent preservation areas and of the legal reserve , within the forest management area.
5.		Possible action 7	Yes	ABNT NBR 15789 - P5, C.5.1.f, C5.2.a (Annex 6). f) evidence that priority is given to the participation of inhabitants of the local populations in the different activities related to the forest management area; a) existence of procedures and instruments for clear and objective dissemination of the activities and forms



No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
6.		Principle 8 Principle 8. Land destined for conversion to other uses (agriculture, mines, etc.), and any land for which the final use is uncertain, should be kept under managed forest until the need for clearing arises.	Yes	<p>of action of the forest enterprise;</p> <p>ABNT NBR 15789 - P1, C1.1.b (Annex 6). b) existence of records that prove fulfillment of legislation and of other regulations applicable to the activities carried out in the forest management area.</p> <p>According to the Brazilian legal system, the selective cutting of native forest tree species, in natural forests, has to be done in conformity to Federal Decree 5.975, published in 30 november, 2006. In the case Management Plans for concessions of Federal Public Forests, Federal Law 11.284 (2 March, 2006) is applicable.</p> <p>A Sustainable Forest Management Plan (PMFS) has to be prepared by the organization interested and submitted to the Brazilian Institute of the Environment (IBAMA) or the State Environmental Agency for examination and approval previous to any harvesting operations.</p> <p>Any land conversion for other uses requires authorization from environmental authorities (SISNAMA).</p>
Forest Management				
7.	Forest management - general	Principle 11	Yes	<p>ABNT NBR 15789 - P2, C2.1.a-b (Annex 6). Criterion 2.1 - The organization shall adopt strategies oriented towards sustainable use and management of forest resources. Indicators:</p> <p>a) Existence of procedures aimed at:</p> <ul style="list-style-type: none"> - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the significant environmental impacts; - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. <p>b) Evidence of the adoption of practices that indicate efficient and environmentally adequate use of forest resources;</p>
8.	Planning	Principle 12	Yes	<p>ABNT NBR 15789 - P2, C2.2.b, C2.2.d (Annex 6). Criterion 2.2 - The Forest operations shall be backed by sustainable forest management plans.</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				Indicators: a) Existence of a legally approved forest management plan. b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas; d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;
9.	Static and dynamic inventory	Principle 13	Yes	ABNT NBR 15789 - P2, C2.2.i (Annex 6). i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest
10.		Possible action 10	Yes	ABNT NBR 15789 - P2, C2.2.i (Annex 6). i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;
11.		Possible action 11	Partly	ABNT NBR 15789 - P2, C2.2.i (Annex 6). i) Existence of continuous forest inventory , adjusted to the planning, assessment of the harvesting and monitoring of the forest; Comment: continuous forest inventory does not equal to permanent sample plot system.
12.	Setting of management objectives	Principle 14.	Yes	ABNT NBR 15789 - P2, C2.2.a (Annex 6). a) Existence of a legally approved forest management plan. Brazilian legislation requires that both public and privately owned forests have a forest management plan approved by environmental authorities and that the plan follows sustainable practices.
13.		Principle 15	Yes	ABNT NBR 15789 - P2, C2.2.b (Annex 6). b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas.
14.	Choice for silvicultural concept	Principle 16	Yes	ABNT NBR 15789 - P2, C2.2.c (Annex 6). c) Existence of technical and economical justifications, documented for the dimensioning of forest management operations;
15.		Possible action 12	Yes	ABNT NBR 15789 - P2, C2.2.c, C2.2.i (Annex 6). c) Existence of technical and economical justifications, documented for the dimensioning of forest management operations;
16.	Yield regulation, Annual Allowable Cut	Principle 17	Yes	ABNT NBR 15789 - P2, C2.2.i (Annex 6). i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;
17.		Possible action 13	Yes	ABNT NBR 15789 - P2, C2.2.b, C2.2.i (Annex 6). b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				areas; i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest; Comment: Calculation of yields and AACs for a broad selection of species is not addressed.
18.		Possible action 14	Yes	ABNT NBR 15789 - P2, C2.2.a, C2.2.b (Annex 6). a) Existence of a legally approved forest management plan. b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas; Brazilian legislation requires an officially approved forest management plan to be in place which sets the harvesting volumes for the management area based on the forest production capacity. Guidelines and limits for harvesting volumes are given in governmental resolution.
19.	Management inventory and mapping	Principle 18	Yes	ABNT NBR 15789 - P2, C2.2.a, C2.2.i (Annex 6). a) Existence of a legally approved forest management plan. i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;
20.		Possible action 15	Yes	ABNT NBR 15789 - P2, C2.2.a, C2.2.i (Annex 6). a) Existence of a legally approved forest management plan. i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;
21.	Preparation of working plans	Principle 19	Yes	ABNT NBR 15789 - P2, C2.1.c, C2.2.d (Annex 6). c) Existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products; d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;
22.		Possible action 16	Partly	ABNT NBR 15789 - P2, C2.1.c, C2.2.h (Annex 6). c) existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products; h) existence of procedures documented and fulfillment of emergencies and contingency plans; P2, 1 C 3.1 a) Existence of information and resources adequate for prevention, vigilance, and control of forest fires P4 C 4.1 b) Existence of procedures for the definition of the forest management area and locating of the road network, taking into consideration the local topography, the soils, and the water resources; c) Evidence that the forest management activities are planned and carried out, taking into consideration the-



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				topography, soils, water resources, and the climate. Comment: No reference is made in the standard to marking and post-harvest inventories (only continuous inventory). The scheme documentation does not refer to applicable legislation either which could fulfil the requirement.
23.	Environmental Impact assessment	Principle 20	Yes	ABNT NBR 15789 - P2, C2.1.a (Annex 6). a) Existence of procedures aimed at: – identifying all environmental aspects that can be influenced and the resulting impacts; – characterising and analysing the significant environmental impacts; – establishing measures for turning positive environmental impacts; – establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; – monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity.
24.		Possible action 17	Yes	ABNT NBR 15789 - P1, C.1.1.b, b) existence of records that prove fulfillment of legislation and of other regulations applicable to the activities carried out in the forest management area. P.2, C2.1.a a) existence of procedures aimed at: identifying all environmental aspects that can be influenced and the resulting impacts; characterising and analysing the significant environmental impacts; establishing measures for turning positive environmental impacts; establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. (Annex 6). According to Brazilian legislation environmental authorities (CONAMA) describes conditions in which EIA is required (especially for activities which may cause significant environmental effects, and in the areas considered as national patrimony). CONAMA resolution (requires that in forest activities (esp. harvesting) EIA must be carried out if the area exceeds 100 ha, and also in smaller areas if they are considered environmentally important (n° 1, 23 January 1986). Resolution n° 237, 19 December 1997 states that silvicultural and harvesting operations require an environmental licencing.
25.		Possible	Yes	ABNT NBR 15789 - P.2, C2.1.a (Annex 6).



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
		action 18		<p>a) Existence of procedures aimed at:</p> <ul style="list-style-type: none"> - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the significant environmental impacts; - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. <p>ABNT NBR 15789 - P2, C2.2.e, C.2.2.g (Annex 6).</p> <p>e) Evidence that the forest management plan was made and is carried out by a legally licensed professional;</p> <p>f) Evidence that the organization aims at improving the botanical identification;</p> <p>g) Evidence that the forest management plan is monitored and revised by a legally licensed professional, incorporating the surveillance results;</p> <p>P2, C2.3 e) evidence that training and labor capacity-building programs are implemented, with the following purposes:</p> <ul style="list-style-type: none"> - technically build the capacity of forest workers; - avoid occupational illnesses and accidents; - minimize occurrences of negative environmental impacts.
26.	Harvesting (general)	Principle 21	Yes	<p>ABNT NBR 15789 - P2, C2.2.d (Annex 6).</p> <p>d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p>
27.	Pre-harvest prescriptions	Principle 22	Yes	<p>ABNT NBR 15789 - P2, C2.2.d (Annex 6).</p> <p>d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p>
28.		Possible action 19	Yes	<p>ABNT NBR 15789 - P2, C2.2.d (Annex 6).</p> <p>ABNT NBR 15789 - P2, C2.2.d (Annex 6).</p> <p>d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p>
29.	Roads	Principle 23	Yes	<p>ABNT NBR 15789 - P4, C4.1.b (Annex 6).</p> <p>b) Existence of procedures for the definition of the forest management area and locating of the road network, taking into consideration the local topography, the soils, and the water resources;</p>
30.		Possible action 20	Yes	<p>ABNT NBR 15789 - P2, C2.1.c, P4, C4.1.b, C.4.1.c, C.4.2.c (Annex 6).</p> <p>P2, C2.1 c) existence of technical and economical justifications, documented for the dimensioning of forest management operations;</p> <p>P4, C4.1. b) Existence of procedures for the definition</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>of the forest management area and locating of the road network, taking into consideration the local topography, the soils, and the water resources;</p> <p>C.4.1. c) Evidence that the forest management activities are planned and carried out, taking into consideration the topography, soils, water resources, and the climate.</p> <p>C.4.2. c) Evidence that the road network and clearings are kept in conditions that do not favor erosion and that keep the water courses;</p> <p>The standard does not detail the parameters, but according to Inmetro/ABNT the indicator of this issue is in the NBR 15789 (P2, C2.1, 1c) and in the Guideline NBR 15753:</p> <p>“c) Existence of documented procedures for silvicultural activities, road construction and maintenance, harvesting and transportation of forest raw material activities; The adaptation to this indicator is strongly related to the understanding of the environmental aspects and impact.</p> <p>The identification of the activities generating environmental aspects and impact makes the planning of the related activities very simple, complete and efficient. The procedures mentioned in this indicator may be based on references, successful or internally developed experiments. They may be described in operational manuals, internal instructions, primers and pamphlets.”</p> <p>The procedures indicated in the item “c” above can be based in the literature as for example “Embrapa Manejo de Baixo Impacto”.</p> <p>Brazilian legislation (Lei 4771, 1965, Art. 1) sets detailed requirements for water protection measures and buffer zones.</p>
31.		Principle 24	Yes	<p>ABNT NBR 15789 - P2, C2.3.d (Annex 6).</p> <p>d) Evidence that the equipment, machines, and consumables are adequate for the local topographic, soil, climatic conditions and to the forest management characteristics.</p>
32.	Extraction	Possible action 21	Yes	<p>ABNT NBR 15789 - P2, C.2.1.c, C2.2.d, P3, C3.3 (Annex 6).</p> <p>P2, C.2.1. c) Existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products;</p> <p>C2.2.d d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p> <p>The standard does not detail the parameters, but according to Inmetro/ABNT the indicator of this issue is in the NBR 15789 (P2, C2.1, 1c) and in the Guideline NBR 15753:</p> <p>“c) Existence of documented procedures for silvicultural activities, road construction and maintenance, harvesting and transportation of forest raw material activities;</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>The adaptation to this indicator is strongly related to the understanding of the environmental aspects and impact.</p> <p>The identification of the activities generating environmental aspects and impact makes the planning of the related activities very simple, complete and efficient. The procedures mentioned in this indicator may be based on references, successful or internally developed experiments. They may be described in operational manuals, internal instructions, primers and pamphlets.”</p> <p>The procedures indicated in the item “c” above can be based in the literature as for example “Embrapa Manejo de Baixo Impacto”.</p> <p>Brazilian legislation (Lei 4771, 1965, Art. 1) sets detailed requirements for water protection measures and buffer zones.</p> <p>CONAMA resolution (requires that in forest activities (esp. harvesting) EIA must be carried out if the harvestable area exceeds 100 ha, and also in smaller areas if they are considered environmentally important (n° 1, 23 January 1986).</p> <p>Resolution n° 237, 19 December 1997 states that silvicultural and harvesting operations require an environmental licencing.</p>
33.	Post-harvest management	Principle 25	Yes	<p>ABNT NBR 15789 - P2, C2.2.i (Annex 6).</p> <p>i) existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;</p>
34.		Possible action 22 Carry out post-harvest inventory, establishing the need for silvicultural interventions.	Yes	<p>ABNT NBR 15789 - P2, C2.2.i (Annex 6).</p> <p>i) existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;</p>
35.	Protection – control of access	Principle 26	Yes	<p>ABNT NBR 15789 - P2, C2.1.d, (Annex 6).</p> <p>d) Evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area.</p>
36.		Possible action 23	Yes	<p>ABNT NBR 15789 - P2, C2.1.c, C.2.1.d, (Annex 6).</p> <p>c) existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products;</p> <p>d) Evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area.</p> <p>The ABNT NBR 15753 - Forest management – Guidance for the implementation of ABNT NBR15789, P2, C2.1, Id explain some ways to do the controls, as:</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>“d) Evidence of protection procedures against land invasions and illegal exploration of forest raw materials in forest management units.</p> <p>The organization shall demonstrate control of its management unit, through the adoption of procedures against land invasion and illegal exploration, such as:</p> <p>The efficient and adapted use of the forest resources is very important in environmental and economical terms. Besides increasing the income of the organization, it is a way to reduce the waste of raw materials and negative impact on the soil, water and biodiversity. The following are examples of practices that may be adopted for the adapted use of the forest resources:</p> <ul style="list-style-type: none"> - utilization of techniques of reduced impact exploration; - an implemented training and recycling program for the collaborators involved in the management, with records of its execution; - a study of the feasibility and possibility of exploration of new wood species, residues of the exploration and other forest resources; - adequate planning of management operations. <p>The adaptation to this indicator is strongly related to the understanding of the environmental aspects and impact.</p> <p>The identification of the activities generating environmental aspects and impact makes the planning of the related activities very simple, complete and efficient. The procedures mentioned in this indicator may be based on references, successful or internally developed experiments. They may be described in operational manuals, internal instructions, primers and pamphlets.</p> <ul style="list-style-type: none"> - maintenance of property limits (backfire, roads, pickets, signs, among others); - periodic surveillance of the AMF (according to the unit size, installation of guard outposts); - a good-neighbor policy: agreement with the neighbors and communities regarding the respect to the borders and monitoring; - control of people or vehicles entrance inside the management unit.”
37.	Protection - fire	Principle 27	Yes	<p>ABNT NBR 15789 – P2, C2.2.h, P3, C3.1.a (Annex 6). P2, C2.2. h) Existence of procedures documented and fulfillment of emergencies and contingency plans; P3, C3.1. a) existence of information and resources adequate for prevention, vigilance, and control of forest fires;</p>
38.		Possible action 24	Yes	<p>ABNT NBR 15789 - P2, C2.2.h, P3, C3.1.a (Annex 6). ABNT NBR 15789 – P2, C2.2.h, P3, C3.1.a (Annex 6). P2, C2.2. h) Existence of procedures documented and fulfillment of emergencies and contingency plans; P3, C3.1. a) existence of information and resources adequate for prevention, vigilance, and control of forest fires;</p> <p>ABNT NBR 15753 – Forest Management – Guidelines</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>for standard implementation (ABNT 15789) also specifies: 4.3.1 Criterion 3.1 – Techniques of forest protection shall be adopted. Indicators: a) Existence of adequate information and resources to prevent, oversee and combat forest fires; Brazilian legislation (Decree No 2 661, 8 July 1998) requires preventive practices for fire management to be applied in forestry activities.</p>
39.		Principle 28	Yes	<p>ABNT NBR 15789 - P4, C4.3 (Annex 6). Indicators: a) Evidence that the technical recommendations for the handling, preparation, and applying of the necessary agrotoxic products in the forest operations are verified; b) Existence of agronomic guidelines in the use of agrotoxic products; c) evidence that agrotoxic products banned by international agreements or laws in force in the country are not used; d) Evidence that the storage of the agrotoxic products, oils, and fuels meet the recommendations of the manufacturers and of the current legislation; e) Existence of a control and forwarding system of agrotoxic products, oils, and fuels, and of its packaging; f) Evidence that the forest workers who handle and apply agrotoxic products are licensed and make use of individual protection equipment; g) Evidence that the transport of agrotoxic products, oils, and fuels in the storage places and the field is carried out with appropriate equipment and vehicles, according to legislation in force.</p>
40.	Protection - chemicals	Possible action 25	Partly	<p>ABNT NBR 15789 - P4, C4.3 (Annex 6). Indicators: a) Evidence that the technical recommendations for the handling, preparation, and applying of the necessary agrotoxic products in the forest operations are verified; b) Existence of agronomic guidelines in the use of agrotoxic products; c) evidence that agrotoxic products banned by international agreements or laws in force in the country are not used; d) Evidence that the storage of the agrotoxic products, oils, and fuels meet the recommendations of the manufacturers and of the current legislation; e) Existence of a control and forwarding system of agrotoxic products, oils, and fuels, and of its packaging; f) Evidence that the forest workers who handle and apply agrotoxic products are licensed and make use of individual protection equipment; g) Evidence that the transport of agrotoxic products, oils, and fuels in the storage places and the field is carried out with appropriate equipment and vehicles, according to legislation in force. Brazilian legislation (CONAMA Resolution no 10, 14</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				December 1988) requires that agrototoxic products shall not be used in nature protection areas. No special instructions or restrictions are given for application near watercourses.
41.	Salvage permits	Principle 32	Yes	ABNT NBR 15789 - P2, C2.1.b (Annex 6). b) Evidence of the adoption of practices that indicate efficient and environmentally adequate use of forest resources;
42.		Possible action 28	Partly	ABNT NBR 15789 - P5, C.5.2.a (Annex 6). a) Existence of procedures and instruments for clear and objective dissemination of the activities and forms of action of the forest enterprise; Comment: This criterion requires that the organization shall implant programs of dissemination and communication with the interested parties and does not necessarily include marketing mechanism.
43.		Possible action 29	Yes	ABNT NBR 15789 - P2, C2.2.i (Annex 6). i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;
44.	Monitoring and research (including yield control and silviculture)	Principle 33	Yes	ABNT NBR 15789 - P2, C2.3.a (Annex 6). a) Evidence that the technology employed is backed by the results of studies and researches carried out for conditions similar to those of the forest management area; P2, C2.2.i (Annex 6). i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;
45.		Possible action 30	No	ABNT NBR 15789 - P2, C2.2.i (Annex 6). i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest; The ABNT NBR 15753 - Forest management – Guidance for the implementation of ABNT NBR15789, P2, C2.2, li: “ i) Existence of ongoing forest inventory, adapted to the planning, evaluation of the exploration and forest monitoring; - perform ongoing forest inventory in sample intensity, which shall be consistent with the variability of the descriptive forest parameters in each Annual Production Unit (UPA); - set forth procedures assuring the inventory results quality, such as: instructions, - field-training manuals; - when it is pertinent, incorporate the forest monitoring results into the planning (PMFS or POA).” Comment: continuous forest inventory does not equal to permanent sample plot system.
46.		Possible action 31	Yes	ABNT NBR 15789 - P2, C2.2.i (Annex 6). i) existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;
47.		Possible	Yes	ABNT NBR 15789 - P2, C2.2.f, C.2.2.i (Annex 6).



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
		action 32		f) Evidence that the organization aims at improving the botanical identification; i) existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest; P2, C2.3.a (Annex 6). a) Evidence that the technology employed is backed by the results of studies and researches carried out for conditions similar to those of the forest management area;
48.		Possible action 33	Yes	ABNT NBR 15789 - P2, C2.1.a, C.2.2.a (Annex 6). P2, C2.1. a) Existence of procedures aimed at: <ul style="list-style-type: none"> - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the significant environmental impacts; - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. C.2.2. a) existence of a legally approved forest management plan. P4 C 4.2 b) Existence of assessment of qualitative and quantitative parameters of water and soil resources, which are, directly or indirectly under the control and influence of the organization; The ABNT NBR 15753 - Forest management – Guidance for the implementation of ABNT NBR15789, P2, C2.2, li: <ul style="list-style-type: none"> “ i) Existence of ongoing forest inventory, adapted to the planning, evaluation of the exploration and forest monitoring; <ul style="list-style-type: none"> - perform ongoing forest inventory in sample intensity, which shall be consistent with the variability of the descriptive forest parameters in each Annual Production Unit (UPA); - set forth procedures assuring the inventory results quality, such as: instructions, - field-training manuals; - when it is pertinent, incorporate the forest monitoring results into the planning (PMFS or POA).” Comment: Social impacts are not covered at all even though identified in Principle 5.
Socio-economic aspects				
49.	Socio-economic and financial aspects (general)	Principle 34	Yes	ABNT NBR 15789 - P5, C5.1.a, C.5.1.c, C.5.1.f, C.5.1.g (Annex 6). P5, C5.1. a) Evidence of the identification of social and



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>economic aspects upon which it is possible to have influence and the resulting impacts; C.5.1. c) Evidence of measures aiming at turning feasible positive social and economic impacts; C.5.1. f) Evidence that priority is given to the participation of inhabitants of the local populations in the different activities related to the forest management area; P1, C 1.3 c) Evidence that the organization has fulfilled its fiscal and tax obligations;</p>
50.	Relations with local populations	Principle 35	Yes	<p>ABNT NBR 15789 - P1, C1.2.a, P5, C5.1.d, C5.1.e (Annex 6). P1, C1.2. a) Evidence that the legal rights of the local, traditional, and indigenous populations are respected; P5, C5.1. d) Evidence that the non-predatory habits and customs of the local, traditional, and indigenous populations are respected; C5.1. e) Evidence that the intellectual property of the traditional and indigenous populations is respected;</p> <p>Brazilian legislation (CONAMA resolution no 1, 23 January 1986 and resolution no 9, 3 December 1987) requires that EIA procedures include consultation with public and other interest groups and if need be, organize public hearing about the project. The purpose of the public hearing is to inform interest groups of activities under assessment and gather comments, critics and suggestions related to these activities.</p>
51.		Principle 36	Yes	<p>ABNT NBR 15789 - P1, C1.2.a, P1, C1.3.b, P5, C5.1.d, C5.1.e (Annex 6). P1, C1.2. a) Evidence that the legal rights of the local, traditional, and indigenous populations are respected; P1, C1.3. b) Evidence that the aspects pertinent to the labor issues are in conformity with the legislation in force, regulatory labor standards, agreements and collective conventions; P5, C5.1. d) Evidence that the non-predatory habits and customs of the local, traditional, and indigenous populations are respected; C5.1. e) Evidence that the intellectual property of the traditional and indigenous populations is respected;</p>
52.		Possible action 34	Yes	<p>ABNT NBR 15789 - P2, C2.2.j, P5,C5.2.a, C5.2.b (Annex 6). P2, C2.2 j) Evidence that the objectives and targets of the forest management plan are known by the forest workers and disseminated to the local populations; P5,C5.2. a) Existence of procedures and instruments for clear and objective dissemination of the activities and forms of action of the forest enterprise; C5.2. b) Existence of communication channel between forest organization and the interested parties; P5, C5.1. d) evidence that the non-predatory habits and customs of The local, traditional, and indigenous populations are respected; P1, C1.2. a) Evidence that the legal rights of the local, traditional, and indigenous populations are respected;</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				Brazilian legislation (CONAMA resolution no 1, 23 January 1986 and resolution no 9, 3 December 1987) requires that EIA procedures include consultation with public and other interest groups and if need be, organize public hearing about the project. The purpose of the public hearing is to inform interest groups of activities under assessment and gather comments, critics and suggestions related to these activities.
53.	Economics, incentives, taxation	Principle 37	Yes	<p>ABNT NBR 15789 - P2, C2.2.a, C2.2.b, C2.2.c (Annex 6). P2, C2.2.</p> <p>a) Existence of a legally approved forest management plan. b) Evidence that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas; c) Existence of technical and economical justifications, documented for the dimensioning of forest management operations;</p> <p>Comment: Focus is in harvesting and wood production, environmental/conservation values are not discussed or valued in the standard.</p>
54.		PA35	Yes	<p>ABNT NBR 15789 - P5, C5.2.a, C5.2.b (Annex 6). a) Existence of procedures and instruments for clear and objective dissemination of the activities and forms of action of the forest enterprise; b) Existence of communication channel between forest organization and the interested parties;</p> <p>Comment: these indicators cover mainly social aspects. Marketing point of view could be strengthened in the standard.</p>
55.		Principle 38	Partly	<p>ABNT NBR 15789 - P2, C2.2.a, C2.2.c (Annex 6). a) Existence of a legally approved forest management plan. c) Existence of technical and economical justifications, documented for the dimensioning of forest management operations; P2, C2.1 d) Evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area.</p> <p>Comment: natural regeneration enhancement activities or e.g. enrichment plantings are not mentioned in the standard.</p> <p>In Brazilian legislation, Decree No 6 600, 21 November 2008 (which regulates provisions of Law 11,428 of December 22, 2006, which provides for the use and protection of native vegetation in the Atlantic Forest Biome) provides for enrichment of native secondary vegetation (species with commercial value)</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
56.		Principle 39	Yes	ABNT NBR 15789 - P1, C1.3.c, C1.3.d (Annex 6). c) Evidence that the organization has fulfilled its fiscal and tax obligations; d) Evidence that the measures with the service providers are taken, aiming its compliance labor, tax, and pension legislation, as well as regulatory labor standards, agreements, and collective conventions;
57.		Principle 40	Yes	ABNT NBR 15789 - P1, C1.3.c, C1.3.d (Annex 6). c) Evidence that the organization has fulfilled its fiscal and tax obligations; d) Evidence that the measures with the service providers are taken, aiming its compliance labor, tax, and pension legislation, as well as regulatory labor standards, agreements, and collective conventions;
58.		Principle 41	Yes	ABNT NBR 15789 - P2, C2.2.a, C2.2.b, C2.2.c. (Annex 6). a) Existence of a legally approved forest management plan. b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas; c) Existence of technical and economical justifications, documented for the dimensioning of forest management operations;
59.		Possible action 36	Yes	ABNT NBR 15789 - P1, C1.1.b (Annex 6). b) Existence of records that prove fulfillment of legislation and of other regulations applicable to the activities carried out in the forest management area.

No.	Question	YES / NO*	Reference to scheme documentation	
Basis for development of criteria for forest management of natural tropical forests – compatibility with ITTO guidelines on the conservation of biological diversity in tropical production forests (1993) ^{[*1], [*2], [*3]}				
Promoting the role of sustainably managed production forests in conserving biodiversity at the landscape level				
60.	Conservation of biodiversity at landscape level	Principle 4: The different categories of land that need to be kept under permanent forest cover include lands for nature conservation and ecosystem preservation (TPAs), fragile lands requiring protection forests, natural production forests and planted production forests - see Appendix 1 in the ITTO Guidelines on the Sustainable Management of Natural Tropical Forests and the ITTO Guidelines on the Establishment and Sustainable Management of Planted Tropical Forests	Yes	ABNT NBR 15789 - P3, C3.3.e (Annex 6). a) existence of procedures for the conservation of flora and fauna within its natural habitat; b) Existence of protection procedures in case of the occurrence of endemic species, rare or endangered in the forest management area; e) Existence of clear definition, mapping, and documentation of the permanent preservation areas and of the legal reserve, within the forest management area.



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
61.	<p>Rec. action 5: Identify, survey and delineate the various categories of the Permanent Forest Estate and develop complementary management plans in consultation with forest dwellers and surrounding populations, taking into account their present and future needs for agricultural land and their customary use of the forest</p>	Yes	<p>ABNT NBR 15789 - P1, C1.2.a; P5, C5.1.a, d (Annex 6). P1, C1.2. a) Existence of procedures aimed at:</p> <ul style="list-style-type: none"> - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the significant environmental impacts; - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. <p>P5, C5.1 a) Evidence of the identification of social and economic aspects upon which it is possible to have influence and the resulting impacts; d) Evidence that the non-predatory habits and customs of the local, traditional, and indigenous populations are respected; Comment: C 5.2. b) Existence of communication channel between forest organization and the interested parties; d) Evidence of good relationship with representative organizations of the local society and related entities;</p> <p>EIA procedures required by Brazilian legislation (for any activities covering an area exceeding 100 ha, and also areas less than 100 ha in case they are environmentally significant) include a public hearing.</p>
62.	<p>Principle 5: Research in conservation biology has indicated that there is a direct relationship between the size of a protected area and the number of species it will conserve in the long-term. Such studies have also indicated that increasing the perimeter to area ratio of a TPA will reduce its effectiveness as a conservation unit. This is due to "edge effects" which favor generalists species rather than species with more specialist habitat requirements</p>	Yes	<p>ABNT NBR 15789 - P3, C3.2, C3.3a-b (Annex 6). P3, C3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan. Indicators:</p> <ul style="list-style-type: none"> a) Existence of initiative, support or partnership for the surveillance of the fauna and local flora; b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan. <p>Criterion 3.3 - The forest operations shall be carried out considering the protection</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
			<p>of the remaining ecosystems. Unique ecosystems with environmental, archaeological, historic cultural, or social importance have to be preserved.</p> <p>Indicators:</p> <p>a) Existence of procedures for the conservation of flora and fauna within its natural habitat;</p> <p>b) Existence of protection procedures in case of the occurrence of endemic species, rare or endangered in the forest management area;</p> <p>Comment: Aim to larger conservation areas is not specifically stated in the standard but general guidelines speak for this objective.</p>
63.	<p>Rec. action 6: Within the constraints of prevailing social and economic circumstances, design TPA's to cover as large an area of natural forest as socially and economically feasible, with due attention to optimizing their shape. Surround these TPA cores with sympathetically managed near-natural production forests to minimize edge effects, and ensure the protection of ecological function</p>	Yes	<p>ABNT NBR 15789 - P3, C3.3a-d (Annex 6).</p> <p>a) Existence of procedures for the conservation of flora and fauna within its natural habitat;</p> <p>b) Existence of protection procedures in case of the occurrence of endemic species, rare or endangered in the forest management area;</p> <p>c) existence of mapping, demarcation and Protection of historic, archaeological sites of cultural or social value;</p> <p>d) identification of the existing conservation units in the influence area of the enterprise;</p> <p>Brazilian forest law requires that a certain percentage (20-80 % of a rural property) of forest management area is preserved for protection.</p> <p>In addition, CONAMA resolution no 10, 14 December 1988 states that protected areas will always have an ecological-economic zoning.</p> <p>Comment: Standard defines only general requirements for protection, not any aim specifying the share of protection areas or individual protection area size is given in the standard as this is specified by the law.</p>
64.	<p>Principle 6: Where forest clearing or disturbance becomes necessary, maintaining the connectivity between undisturbed forests will help to minimize erosion of biodiversity. In designing such connecting areas, a fundamental principle is to facilitate the movement of seeds, pollen and animals between</p>	Yes	<p>ABNT NBR 15789 - P3, C3.3 a-b (Annex 6).</p> <p>Criterion 3.3 - The forest operations shall be carried out considering the protection of the remaining ecosystems. Unique ecosystems with environmental, archaeological, historic cultural, or social importance have to be preserved.</p> <p>Indicators:</p>



Indufor

Annex 1

No.	Question		YES / NO*	Reference to scheme documentation
		the various forest areas and other habitats		a) existence of procedures for the conservation of flora and fauna within its natural habitat; ABNT NBR 14789 – P3, C 3.4 a) Existence of phytosociological surveys and studies on the structure of remaining native vegetation; b) Existence of periodic surveys or inventories that are sufficient to detect imbalances in the composition of local wildlife; C 3.2 b) Layout and planning of forest plantations interspersed with patches of native vegetation, thereby contributing to the formation of ecological corridors for resident and migratory fauna; Comment: General requirement to consider protection of remaining ecosystems in forest operations can be interpreted to cover also the connectivity issue but it is recommended that this would be specified in the standard in more detail.
65.		Rec. action 7: Link TPA reserves by providing "corridors" of natural forest and ensuring that the habitat at known major resting sites and the known ends of migration routes are retained. Locate production forests to maximize the connectivity between natural forest TPA's at the landscape level	Yes	ABNT NBR 15789 - P3, C3.3a-b (Annex 6). The forest operations shall be carried out considering the protection of the remaining ecosystems. Unique ecosystems with environmental, archaeological, historic cultural, or social importance have to be preserved. Indicators: a) Existence of procedures for the conservation of flora and fauna within its natural habitat; b) Existence of protection procedures in case of the occurrence of endemic species, rare or endangered in the forest management area; Comment: General requirement to consider protection of flora and fauna within its natural habitat can be interpreted to cover also the migration issue but it is recommended that this would be specified in the standard in more detail.
66.	Planning – choice of silvicultural concept	Principle 7: Silvicultural systems that aim to change species composition or selectively remove certain structural or floristic components of the forest can have a negative effect on biodiversity conservation. Forest areas of recognized importance for biodiversity conservation should be the subject of special action as recommended below.	Yes	ABNT NBR 15789 – P2, C2.2; P3, C3.2 (Annex 6). C 2.2 - The Forest operations shall be backed by sustainable forest management plans. Indicators: a) Existence of a legally approved forest management plan. b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
			<p>cycle. When it is the case, the forest management plan shall assure the incorporation of new areas;</p> <p>d) existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p> <p>C 3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan.</p> <p>Indicators:</p> <p>a) Existence of initiative, support or partnership for the surveillance of the fauna and local flora;</p> <p>b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p> <p>Comment: Covered at general level but should be further specified in the following standard revision process.</p>
67.	<p>Rec. action 8: Particular care should be taken in applying silvicultural treatments to ensure that adequate populations of species which are important in food chains or in providing ecological functions (keystone species) are retained.</p> <p>In the case of plantations, the use of indigenous species should be encouraged</p>	Yes	<p>ABNT NBR 15789 – P2, C2.2; P3, C3.2, C3.3 (Annex 6).</p> <p>Criterion 2.2 - The Forest operations shall be backed by sustainable forest management plans.</p> <p>Indicators:</p> <p>a) Existence of a legally approved forest management plan.</p> <p>b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas;</p> <p>c) Existence of technical and economical justifications, documented for the dimensioning of forest management operations;</p> <p>d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p> <p>e) Evidence that the forest management plan was made and is carried out by a legally licensed professional;</p> <p>f) Evidence that the organization aims at improving the botanical identification;</p> <p>g) Evidence that the forest management plan is monitored and revised by a legally licensed professional, incorporating the surveillance results;</p> <p>h) Existence of procedures documented</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
			<p>and fulfillment of emergencies and contingency plans;</p> <p>i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;</p> <p>j) Evidence that the objectives and targets of the forest management plan are known by the forest workers and disseminated to the local populations;</p> <p>C 3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan.</p> <p>Indicators:</p> <p>a) Existence of initiative, support or partnership for the surveillance of the fauna and local flora;</p> <p>b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p> <p>C 3.3 - The forest operations shall be carried out considering the protection of the remaining ecosystems. Unique ecosystems with environmental, archaeological, historic cultural, or social importance have to be preserved.</p> <p>Indicators:</p> <p>a) Existence of procedures for the conservation of flora and fauna within its natural habitat;</p> <p>b) Existence of protection procedures in case of the occurrence of endemic species, rare or endangered in the forest management area;</p> <p>c) Existence of mapping, demarcation and protection of historic, archaeological sites of cultural or social value;</p> <p>d) identification of the existing conservation units in the influence area of the enterprise;</p> <p>e) Existence of clear definition, mapping, and documentation of the permanent preservation areas and of the legal reserve, within the forest management area.</p> <p>Comment: Covered at general level but should be further specified in the following standard revision process.</p>
68.	Rec. action 9: Trees with hollows, standing dead trees (snags) and decomposing fallen trees all have ecological importance for a range of species and not all should be removed from the forest in any silvicultural treatment to improve timber	Yes	<p>ABNT NBR 15789 – P2, C2.2; P3, C3.2; C3.3,(Annex 6).</p> <p>Criterion 2.2 - The Forest operations shall be backed by sustainable forest management plans.</p> <p>Indicators:</p> <p>a) Existence of a legally approved forest</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
	yields		<p>management plan.</p> <p>b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas;</p> <p>d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p> <p>j) Evidence that the objectives and targets of the forest management plan are known by the forest workers and disseminated to the local populations;</p> <p>C 3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan.</p> <p>Indicators:</p> <p>C 3.3 - The forest operations shall be carried out considering the protection of the remaining ecosystems. Unique ecosystems with environmental, archaeological, historic cultural, or social importance have to be preserved.</p> <p>Indicators:</p> <p>a) Existence of procedures for the conservation of flora and fauna within its natural habitat;</p> <p>b) Existence of protection procedures in case of the occurrence of endemic species, rare or endangered in the forest management area;</p> <p>Comment: The requirement is very specific thus the general requirements of Cerflor standard cannot ensure that this requirement would be complied with. However, requirements of the law ensure that SFM practices described in Rec. Action 9 are followed as forest management area needs to have the legally approved forest management plan applying practices of SFM. SFM practices include that in native forests only 3 to 5 trees/ha (21 – 30 m3) each 30 year are removed and trees with hollows, etc remain in the forest.</p>
69.	Rec. action 10: The use of pesticides or other chemicals should be kept to a minimum in any silvicultural treatment, and the manufacturers instructions for the use of each product should be strictly ob-	Yes	<p>ABNT NBR 15789 – P2, C2.2; P3, C3.1.c; P4, C4.3 (Annex 6).</p> <p>c) Evidence of the procedures, which aim at the adequate use and minimization of the employment of agrotoxic products.</p> <p>P4, C4.3 - The organization shall adopt a</p>



Indufor

Annex 1

No.	Question		YES / NO*	Reference to scheme documentation
		served.		<p>policy of rational use of agrototoxic, oil, and fuel products, and forwarding of its residues and packaging.</p> <p>Indicators:</p> <p>a) Evidence that the technical recommendations for the handling, preparation, and applying of the necessary agrototoxic products in the forest operations are verified;</p> <p>b) Existence of agronomic guidelines in the use of agrototoxic products;</p> <p>c) evidence that agrototoxic products banned by international agreements or laws in force in the country are not used;</p> <p>d) Evidence that the storage of the agrototoxic products, oils, and fuels meet the recommendations of the manufacturers and of the current legislation;</p> <p>e) existence of a control and forwarding system of agrototoxic products, oils, and fuels, and of its packaging;</p> <p>f) Evidence that the forest workers who handle and apply agrototoxic products are licensed and make use of individual protection equipment;</p> <p>g) Evidence that the transport of agrototoxic products, oils, and fuels in the storage places and the field is carried out with appropriate equipment and vehicles, according to legislation in force.</p>
70.	Planning – yield regulation, annual allowable cut and rotation time	Principle 8: The presence of some larger and older trees in the forest, and longer intervals between the disturbances caused by harvesting operations, generally favor biodiversity conservation	Yes	<p>ABNT NBR 15789 – P2, C2.1; C2.2.i; P3, C3.3.a (Annex 6).</p> <p>i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;</p> <p>Criterion 2.2 - The Forest operations shall be backed by sustainable forest management plans.</p> <p>Indicators:</p> <p>a) Existence of a legally approved forest management plan.</p> <p>b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas;</p> <p>Criterion 2.1 - The organization shall adopt strategies oriented towards sustainable use and management of forest resources.</p> <p>Indicators:</p> <p>a) Existence of procedures aimed at:</p> <ul style="list-style-type: none"> - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the signifi-



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
			<p>cant environmental impacts;</p> <ul style="list-style-type: none"> - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. <p>b) Evidence of the adoption of practices that indicate efficient and environmentally adequate use of forest resources;</p> <p>c) existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products;</p> <p>d) Evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area.</p> <p>Comment: Standard includes only general requirement of sustainability and conservation (focusing on areas specifically protected), not specifying an aim to extend cutting cycle or to preserve older trees in the stand. However, CONAMA resolution No 406, 2 February 2009 specifies in detail how sustainable cutting cycle should be determined in the Amazonia region.</p>
71.	<p>Rec. action 11: In forest areas of recognized importance for biodiversity conservation incorporate consideration of the effects of rotation length, felling cycles, girth limits and size of the annual area cut-over in deciding the allocation of the AAC</p>	Yes	<p>ABNT NBR 15789 – P2, C2.1; C2.2. a, b; P3, C3.2.b (Annex 6).</p> <p>Criterion 2.1 - The organization shall adopt strategies oriented towards sustainable use and management of forest resources. Indicators:</p> <p>a) Existence of procedures aimed at:</p> <ul style="list-style-type: none"> - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the significant environmental impacts; - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. <p>b) Evidence of the adoption of practices</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
			<p>that indicate efficient and environmentally adequate use of forest resources;</p> <p>c) existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products;</p> <p>d) Evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area.</p> <p>P2, C2.2 - The Forest operations shall be backed by sustainable forest management plans.</p> <p>Indicators:</p> <p>a) Existence of a legally approved forest management plan.</p> <p>b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas;</p> <p>C3.2. b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p> <p>Comment: Standard includes only general requirement of sustainability and conservation (focusing on areas specifically protected).</p> <p>Brazilian forest legislation gives specific guidelines for rotation and logging volume setting (CONAMA resolution No 406, 2 February 2009).</p> <p>Brazilian forest law requires that a certain percentage (20-80 % of a rural property) of forest management area is preserved for protection.</p>
72.	Principle 9: In general, a mosaic of old-growth forests in close proximity to logged forests will help to maintain biodiversity	Yes	<p>ABNT NBR 15789 – P2, C2.1; C2.3.a, c (Annex 6).</p> <p>Criterion 2.1 - The organization shall adopt strategies oriented towards sustainable use and management of forest resources.</p> <p>Indicators:</p> <p>a) Existence of procedures aimed at:</p> <ul style="list-style-type: none"> - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the significant environmental impacts; - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, mitigating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of mea-



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
			<p>surements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity.</p> <p>b) Evidence of the adoption of practices that indicate efficient and environmentally adequate use of forest resources;</p> <p>c) existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products;</p> <p>d) evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area.</p> <p>P2, C2.2 - The Forest operations shall be backed by sustainable forest management plans.</p> <p>Indicators:</p> <p>a) Existence of a legally approved forest management plan.</p> <p>b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas;</p> <p>C3.2. b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p> <p>P2, C2.3 a) Evidence that the technology employed is backed by the results of studies and researches carried out for conditions similar to those of the forest management area;</p> <p>b) Evidence of revision of the procedures for execution of the forest management operations;</p> <p>c) Evidence that the operational procedures incorporate successful results and technically based on experiences, tests or researches carried out in the region, in order to improve the conduction of forest management;</p> <p>Comment: The standard for planted forests establishes that natural forest mosaic should be maintained between planted forest creating biodiversity corridors. In natural forest standard creation of a mosaic structure is not required, only general requirements of sustainability and conservation are included.</p> <p>However, Brazilian forest legislation gives specific guidelines for rotation and logging</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
73.	<p>Rec. action 12: When determining yield allocations and rotation lengths for particular management units, plan logging operations so that a mosaic of recently logged and old growth forests are maintained over time</p>	Yes	<p>volume setting for natural forests to ensure that old growth trees remain in logged areas (CONAMA resolution No 406, 2 February 2009). Resolution also provides for the maintenance of tree species variety.</p> <p>ABNT NBR 15789 – P2, C2.1.b, C2.2.a, b (Annex 6). P2, C2.1. b) Evidence of the adoption of practices that indicate efficient and environmentally adequate use of forest resources; C2.2. a) existence of a legally approved forest management plan. b) Evidences that the forest management plan assures the sustainability of the harvest in terms compatible with the cutting cycle. When it is the case, the forest management plan shall assure the incorporation of new areas; Comment: Standard includes only general requirement of sustainability and conservation (focusing on areas specifically protected). To fully comply with this requirement, the next standard revision process should specify the issue in more detail in the standard, covering also production forest areas.</p> <p>Brazilian forest legislation gives specific guidelines for rotation and logging volume setting for natural forests to ensure that old growth trees remain in logged areas (CONAMA resolution No 406, 2 February 2009). Resolution also provides for the maintenance of tree species variety.</p> <p>Brazilian forest law requires that a certain percentage (20-80 % of a rural property) of forest management area is preserved for protection.</p>
74.	<p>Planning – management inventory and mapping</p> <p>Principle 10: A system of small (approximately 100 ha) undisturbed forest reserves within the management area can have profound positive effects on biodiversity conservation that are disproportionate to their size. A system of such reserves, carefully distributed throughout the management area, can act as temporary refuges for fauna moving away from the active logging areas and also as sources for rapid re-colonization</p>	Partly	<p>ABNT NBR 15789 – P2, C2.2.a, i; P4; C4.3 (Annex 6). P2, C2.1 - The organization shall adopt strategies oriented towards sustainable use and management of forest resources. Indicators: a) existence of procedures aimed at: - identifying all environmental aspects that can be influenced and the resulting impacts; - characterising and analysing the significant environmental impacts; - establishing measures for turning positive environmental impacts; - establishing measures for avoiding, miti-</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
			<p>gating or compensating significant negative environmental impacts caused by forest management activity; - monitoring the implementation of measurements in order to avoid, mitigate, or compensate significant negative environmental impacts caused by forest management activity. b) Evidence of the adoption of practices that indicate efficient and environmentally adequate use of forest resources; c) existence of documented procedures for activities of silvicultural treatments, opening, and maintenance of roads, harvest, and transport of forest products; d) evidence of the procedures of protection against land invasion and illegal logging of forest products in the forest management area. C2.2. a) existence of a legally approved forest management plan. i) existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest; Comment: The standard for planted forests establishes that natural forest mosaic should be maintained between planted forest creating biodiversity corridors. In natural forest standard creation of a mosaic structure is not required, only requirements of sustainability and conservation are included.</p>
75.	<p>Rec. action 13: Within each major management area, a system of small virgin reserves should be designated on the management plan and maps. The boundaries of these reserves should be marked in the field where feasible</p>	Yes	<p>ABNT NBR 15789 – P3, C3.3.c, e (Annex 6). c) Existence of mapping, demarcation and protection of historic, archaeological sites of cultural or social value; d) identification of the existing conservation units in the influence area of the enterprise; e) Existence of clear definition, mapping, and documentation of the permanent preservation areas and of the legal reserve, within the forest management area. Comment: Strictly speaking the standard requires only conservation of areas with special value.</p>
76.	<p>Principle 11: Not all areas of a production forest will have equal importance for biodiversity conservation. Sites of particular importance for biodiversity conservation (key areas) will include: * areas adjacent to TPA reserves;</p>	Yes	<p>ABNT NBR 15789 – P3, C3.3 (Annex 6). C3.3 - The forest operations shall be carried out considering the protection of the remaining ecosystems. Unique ecosystems with environmental, archaeological, historic cultural, or social importance have to be preserved. Indicators:</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
	<ul style="list-style-type: none"> * areas with populations of rare or endangered species or with high concentrations of endemic species, or with exceptional species richness; * areas with unusual land-forms, geology or other physical features not adequately represented in TPA's; * rivers, streams and wetland areas; * areas with forest types not represented in TPA's; * areas that contain biological diversity of social or cultural value, or of medicinal, agricultural or other economic value; * areas that contain habitats frequented by migrating species 		<p>a) Existence of procedures for the conservation of flora and fauna within its natural habitat;</p> <p>b) Existence of protection procedures in case of the occurrence of endemic species, rare or endangered in the forest management area;</p> <p>c) existence of mapping, demarcation and protection of historic, archaeological sites of cultural or social value;</p> <p>d) identification of the existing conservation units in the influence area of the enterprise;</p> <p>e) Existence of clear definition, mapping, and documentation of the permanent preservation areas and of the legal reserve, within the forest management area.</p> <p>Brazilian legislation requires an EIA procedures in forest activities affect an area larger than 100 ha, and also in smaller areas if they are environmentally important.</p> <p>Comment: it is recommended that environmental values (including waters and physical features) would be specified in more detail in the standard.</p>
77.	<p>Rec. action 14: Management inventories should aim to locate key areas within all production forest units that are known to have higher biodiversity values as outlined in Principle 12</p>	Yes	<p>ABNT NBR 15789 – P2, C2.2.i; C3.2; C3.3 c (Annex 6).</p> <p>C2.2 i) existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;</p> <p>P3, C3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan.</p> <p>Indicators:</p> <p>a) Existence of initiative, support or partnership for the surveillance of the fauna and local flora;</p> <p>b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p> <p>C3.3 c) Existence of mapping, demarcation and protection of historic, archaeological sites of cultural or social value;</p>
78.	<p>Rec. action 15: Working plans should prescribe appropriate management measures in accordance with the specific biodiversity value of these key areas. Buffer strips of no intervention should be established along streams and around</p>	Yes	<p>ABNT NBR 15789 – P2, C2.2. d; C2.3 c; P3, C3.3.e (Annex 6).</p> <p>C 2.2. d) existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p>



Indufor

Annex 1

No.	Question		YES / NO*	Reference to scheme documentation
		lakes and wetland areas		<p>C2.3 a) Evidence that the technology employed is backed by the results of studies and researches carried out for conditions similar to those of the forest management area;</p> <p>c) Evidence that the operational procedures incorporate successful results and technically based on experiences, tests or researches carried out in the region, in order to improve the conduction of forest management;</p> <p>C3.3 e) Existence of clear definition, mapping, and documentation of the permanent preservation areas and of the legal reserve, within the forest management area. Comment: Cerflor standard does not specifically address water protection issues e.g. through requirement to establish buffer zones but both biodiversity issues and water management issues are thoroughly covered by legislation (Law 4771,1965 – Forest Code, Art. 1), setting also minum width for buffer zones.</p>
79.		Principle 12: Biodiversity conservation is strongly affected by degree of canopy disruption, extent of damage to the standing vegetation and severity of erosion	Yes	ABNT NBR 15789 – P2, C2.2.d (Annex 6). d) existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;
80.	Extraction	Rec. action 16: Management inventories should aim to locate key areas within all production forest units that are known to have higher biodiversity values as outlined in Principle 12	Yes	<p>ABNT NBR 15789 – P2, C2.2.i; C3.3 c(Annex 6). C2.2 i) Existence of continuous forest inventory, adjusted to the planning, assessment of the harvesting and monitoring of the forest;</p> <p>C3.3. c) existence of mapping, demarcation and protection of historic, archaeological sites of cultural or social value;</p> <p>P3, C3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan.</p> <p>Indicators:</p> <p>a) Existence of initiative, support or partnership for the surveillance of the fauna and local flora;</p> <p>b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p>
81.		Rec. action 17: Minimize machinery and felling damage to the residual stand, undergrowth and soil	Yes	<p>ABNT NBR 15789 – P2, C2.3.a, c, d (Annex 6). C2.3 a) Evidence that the technology employed is backed by the results of studies and researches carried out for conditions similar to those of the forest management</p>



Indufor

Annex 1

No.	Question		YES / NO*	Reference to scheme documentation
				<p>area;</p> <p>c) Evidence that the operational procedures incorporate successful results and technically based on experiences, tests or researches carried out in the region, in order to improve the conduction of forest management;</p> <p>d) Evidence that the equipment, machines, and consumables are adequate for the local topographic, soil, climatic conditions and to the forest management characteristics.</p>
82.	Implementation	<p>Principle 13: Biodiversity conservation can provide many benefits to the global community, to national economies and local populations. Management for biodiversity conservation may add extra costs to management of production forests but may also yield extra economic and social benefits</p>	Yes	<p>ABNT NBR 15789 – P2, C2.1.b; P5, C5.1.c (Annex 6).</p> <p>P2, C2.1. b) Evidence of the adoption of practices that indicate efficient and environmentally adequate use of forest resources;</p> <p>P5, C5.1. c) Evidence of measures aiming at turning feasible positive social and economic impacts;</p> <p>g) existence of actions that stimulate local enterprises;</p>
83.		<p>Rec. action 19: Efforts should be made to involve local people in the management of the forests, and to ensure that they obtain benefits, which will motivate the people themselves to use their traditional knowledge in support of the conservation of biodiversity</p>	Yes	<p>ABNT NBR 15789 – P5, C5.1.f (Annex 6).</p> <p>f) evidence that priority is given to the participation of inhabitants of the local populations in the different activities related to the forest management area;</p>
84.	Research and monitoring	<p>Principle 14: The value of production forests to biodiversity and the effects of various management systems are inadequately understood. Additional information on the status of biodiversity in production forests and the efficacy of the management measures instituted to minimize its erosion is needed</p>	Yes	<p>ABNT NBR 15789 – P2, C2.2.d, e, f, g, C2.3.a; P3, C3.2 (Annex 6).</p> <p>d) Existence of planning of the pre-harvesting and harvesting operations, aiming at minimizing the negative impacts, caused by the harvest of the remaining forest;</p> <p>e) Evidence that the forest management plan was made and is carried out by a legally licensed professional;</p> <p>f) Evidence that the organization aims at improving the botanical identification;</p> <p>g) Evidence that the forest management plan is monitored and revised by a legally licensed professional, incorporating the surveillance results;</p> <p>P3, C3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan.</p> <p>Indicators:</p> <p>a) Existence of initiative, support or partnership for the surveillance of the fauna and local flora;</p>



Indufor

Annex 1

No.	Question	YES / NO*	Reference to scheme documentation
85.	Rec. action 20: Investigate and adapt existing systems to develop locally specific, rapid, cost-effective and efficient biodiversity surveys and monitoring systems that could be carried out by, or in conjunction with, forest inventory teams during their survey activities. Implement such systems as a part of normal forest inventory processes	Yes	<p>b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p> <p>ABNT NBR 15789 – P2, C2.3.b, c; P3, C3.2 (Annex 6).</p> <p>P2, C2.3. b) Evidence of revision of the procedures for execution of the forest management operations;</p> <p>c) Evidence that the operational procedures incorporate successful results and technically based on experiences, tests or researches carried out in the region, in order to improve the conduction of forest management;</p> <p>P3, C3.2 - The biological resources of the Forest management area shall be monitored in order to provide information for the confirmation or revision of the forest management plan.</p> <p>Indicators:</p> <p>a) Existence of initiative, support or partnership for the surveillance of the fauna and local flora;</p> <p>b) Evidence of incorporation of the surveillance results of the flora and fauna to the forest management plan.</p>

Requirements for criteria for forest management of tropical planted forests

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
Basis for development of criteria for forest management of planted tropical forests – compatibility with ITTO guidelines for the establishment and sustainable management of planted forests (1993) [*1], [*2], [*3]				
Policy and legislation				
86.	Permanent forest estate	Principle 10	Partly	<p>ABNT NBR 14789 - P1, C1.1; P3, C3.2.g, C 3.5.a (Annex 5).</p> <p>P1, C1.1 The organization must undertake the pertinent activities for establishing and managing forests in accordance with current legislation and other forest and environmental regulations applicable.</p> <p>Indicators:</p> <p>a) Existence of procedures for identifying laws and other regulations that are applicable to the establishment and management of the forest management unit;</p> <p>b) Existence of records providing evidence of compliance with laws and other regulations that are applicable to the establishment and management of the forest management unit.</p> <p>P3, C3.2. g) Evidence of actions to restore permanent preservation areas that have been degraded.</p> <p>C 3.5. a) Existence of maps or sketches indicating permanent preservation areas and legal reserves,</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
87.		Principle 11	Yes	<p>with their respective identification;</p> <p>ABNT NBR 14789 - P1, C1.1, C1.2, P5, C5.1.d, C5.1.e. (Annex 5).</p> <p>P1, C1.1 The organization must undertake the pertinent activities for establishing and managing forests in accordance with current legislation and other forest and environmental regulations applicable.</p> <p>Indicators:</p> <p>a) Existence of procedures for identifying laws and other regulations that are applicable to the establishment and management of the forest management unit;</p> <p>b) Existence of records providing evidence of compliance with laws and other regulations that are applicable to the establishment and management of the forest management unit.</p> <p>C 1.2 The rights of local communities to use and occupy land with natural forests must be respected, according to the law in force.</p> <p>Indicators:</p> <p>a) Evidences that the legal and traditional non-predatory rights of the local communities are being respected;</p> <p>b) Evidences that areas neighboring or contiguous to the forest management unit, where local communities are living, are identified and respected;</p> <p>c) Existence of a land tenure or land use document which proves the demarcation of the forest management unit and which is consistent with the management plan; and</p> <p>d) Evidence that the organization acts in an effective way to solve possible conflicts or legal disputes related to land tenure or losses inflicted to third parties.</p> <p>P5, C5.1. d) Evidence that the non-predatory habits and customs of the local, traditional and indigenous communities are being respected;</p> <p>e) Evidence that the intellectual property of traditional and indigenous populations is being respected.</p> <p>Comment: Brazilian legislation requires EIA procedures to be carried out in activities covering more than 100 ha, or less in environmentally important areas. EIA procedures include a public hearing.</p>
88.		Rec. action 8	Yes	<p>ABNT NBR 14789 - P2, C2.2.a, P3, C3.2.e & f, P5, C5.1.d (Annex 5).</p> <p>P2, C2.2. a) Existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains:</p> <ul style="list-style-type: none"> - management conditions according to regional and local circumstances; - silvicultural management scheme to be implemented; - justification of the economic viability of the management plans;



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<ul style="list-style-type: none"> - road network system; - age at planned harvest; - growth and production estimates by harvest product type; - maps or sketches of the forest management unit with indications of land use and occupation; - land survey data, classes and types of soils and vegetation, as well as available water resources; - existence of a multi-annual program for planting or re-planting, harvesting and maintenance; - contingency plans in the case of fires, disasters and fortuitous events; - continuous forest inventory; and - indication of alternative sources to those in the management plan for obtaining forest raw materials. <p>P3, C3.2. e) Existence of mapping, demarcation and protection of historic, archeological sites, and those of cultural and social value;</p> <p>f) Identification of the existing conservation units in areas influenced by the production activity; and</p> <p>P5, C5.1. d) evidence that the non-predatory habits and customs of the local, traditional and indigenous communities are being respected;</p> <p>Comment: Brazilian legislation requires EIA procedures to be carried out in activities covering more than 100 ha, or less in environmentally important areas. EIA procedures include a public hearing.</p>
89.		Principle 12	Yes	<p>ABNT NBR 14789 - P3, C3.2.a-f, P5, C5.2 (Annex 5).</p> <p>Forest operations shall be undertaken with protection of remaining ecosystems taken into consideration. Unique ecosystems of environmental, archeological, historical, cultural or social importance shall be preserved.</p> <p>Indicators:</p> <ul style="list-style-type: none"> a) Forest plantations, as well as infrastructure works, must be established in already anthroponized areas or in areas that are susceptible to suppression as set forth by legislation; b) Layout and planning of forest plantations interspersed with patches of native vegetation, thereby contributing to the formation of ecological corridors for resident and migratory fauna; c) Existence of mapping or demarcation of <i>habitats</i> of endemic, rare and threatened species; d) Evidence of restricted access and implementation of surveillance in areas where threatened species occur; e) Existence of mapping, demarcation and protection of historic, archeological sites, and those of cultural and social value; f) Identification of the existing conservation units in areas influenced by the production activity; <p>P5, C5.2 The organization shall implement dissemination and communication programs for stakehold-</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>ers. Indicators: a) existence of procedures or instruments for clearly and objectively disseminating information regarding activities and means of operation of the forestry enterprise; b) evidence of implemented programs to promote communication on matters of common interest of the organization and stakeholders, both internally and externally; c) evidence of the receipt, analysis and response to questions and of adapting conciliatory measures aimed at resolving any disputes between the representatives of the forest management unit and the interested parties, both externally and internally; and d) evidence of good relations with the organizations that represent local society, with government agencies and with related entities.</p> <p>According to standard requirements clearance of natural forest is not very much restricted as the “anthroponized areas” may also cover slightly degraded natural forests. Community consultation is not specifically required in the standard.</p> <p>However, Brazilian legislation (Federal Decree 5.975, published in 30 November, 2006 and Federal Law 11.284, 2 March, 2006), requires logging to be according to legally approved Sustainable Forest Management Plan and authorization from environmental authorities is required before any logging activities or land use change. If area to be logged exceeds 100 ha, EIA process, including a public consultation, must be followed. In areas which are environmentally important, EIA must be carried out even though logging area would be less than 100.</p>
90.		Principle 13	Yes	<p>ABNT NBR 14789 - P3, C3.2.a, C3.2.g (Annex 5). ecosystems of environmental, archeological, historical, cultural or social importance shall be preserved. Indicators: a) forest plantations, as well as infrastructure works, must be established in already anthroponized areas or in areas that are susceptible to suppression as set forth by legislation;</p> <p>Comment: “anthroponized areas” is rather inaccurate definition which may cover natural forests of various scales of human influence and/or degradation. However, Brazilian legislation and environmental procedures ensure that Principle 13 requirements are met.</p>
91.		Rec. action 9	Partly	<p>ABNT NBR 14789 - P2, C2.2.a,c, d ,e, f P5, C5.2 (Annex 5). P2, C2.2. The forest operations shall be based on an up to date forest management plan.</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>Indicators:</p> <p>a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains:</p> <ul style="list-style-type: none"> — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. <p>b) evidence that the management plan was prepared and is being monitored by legally authorized professionals;</p> <p>c) evidence that the multi-annual management plan is being monitored and revised;</p> <p>d) evidence that the results of the monitoring are being incorporated into the management plan;</p> <p>e) evidence that the management plan is being divulged to and known by forest workers and local communities, except for confidential information that might compromise competitiveness;</p> <p>P5, C5.2 The organization shall implement dissemination and communication programs for stakeholders.</p> <p>Indicators:</p> <p>a) existence of procedures or instruments for clearly and objectively disseminating information regarding activities and means of operation of the forestry enterprise;</p> <p>b) evidence of implemented programs to promote communication on matters of common interest of the organization and stakeholders, both internally and externally;</p> <p>c) evidence of the receipt, analysis and response to questions and of adapting conciliatory measures aimed at resolving any disputes between the representatives of the forest management unit and the interested parties, both externally and internally; and</p> <p>d) evidence of good relations with the organizations that represent local society, with government agencies and with related entities.</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>Comment: Community consultation is not specifically required in the management plan preparation or revision. According to Brazilian legislation, public hearings are required in EIA process (EIA needed for forest activities affecting areas more than 100 ha, or affecting environmentally important areas).</p>
92.		Principle 15	Yes	<p>ABNT NBR 14789 - P1, C1.2, P3, C3.2.e (Annex 5). P1 C 1.2 The rights of local communities to use and occupy land with natural forests must be respected, according to the law in force. Indicators: a) evidences that the legal and traditional non-predatory rights of the local communities are being respected; b) evidences that areas neighboring or contiguous to the forest management unit, where local communities are living, are identified and respected; c) existence of a land tenure or land use document which proves the demarcation of the forest management unit and which is consistent with the management plan; and d) evidence that the organization acts in an effective way to solve possible conflicts or legal disputes related to land tenure or losses inflicted to third parties.</p>
Feasibility assessment				
93.	Environmental considerations	Rec. action 13	Yes	<p>ABNT NBR 14789 - P2. C2.1.a, c, e, C2.2.a; P5, C5.1.a, c (Annex 5). P2. C2.1 The organization shall adopt strategies oriented to the sustainable use and management of the forest resources. Indicators: a) existence of procedures aimed at: — identify all environmental aspects that can be controlled or influenced, along with the related environmental impacts, — identify and characterize significant environmental impacts, — characterize, assess and establish measures to avoid or minimize negative environmental impacts on the forest management unit. — monitor the implementation of the measures to avoid, mitigate or compensate significant and negative environmental impacts caused by the activity of forest management ; c) evidence of adopting practices that show efficient use of produced forest resources; e) existence of a program of reduction or employment of forest harvesting residues. P5, C5.1.a, c a) evidence of possible influence on the identification of socioeconomic parameters and the resulting impacts; c) evidence of measures to enhance positive socioeconomic impacts;</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
94.		Rec. action 14	Yes	<p>ABNT NBR 14789 - P 2, C 2.2 a; P2, C2.3; P3, C3.2; P4, C4.1 (Annex 5). P 2 C 2.2 a) The forest operations shall be based on an up to date forest management plan. Indicators: a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — management conditions according to regional and local circumstances; — justification of the economic viability of the management plans; P2, C2.3 The organization shall implement forest technology that is suited to local characteristics. Indicators: a) evidence that the silvicultural technology employed is based on the results of research and studies performed under conditions similar to those of the forest management unit; b) evidence that documented procedures for the activities of seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material are updated; c) evidence that procedures incorporate shall from the experiments, tests and research performed in the region. Comment: unclear translation d) existence of formal mechanisms of technology transference to the forest workers and to third parties of the own organization; e) evidence of implementation of forest worker training and capacity building programs, with the following objectives: - technical training of forest workers; - avoiding diseases and work accidents; and - minimizing the occurrences of negative environmental impacts; f) evidence that equipment, machinery and supplies are suited to local conditions of topography, soil, climate and characteristics of produced forest resources. P3, C3.2 Forest operations shall be undertaken with protection of remaining ecosystems taken into consideration. Unique ecosystems of environmental, archeological, historical, cultural or social importance shall be preserved. P4, C4.1 Forest management shall be based on environmental planning prior to the area use.</p>
95.		Rec. action 15	Yes	<p>ABNT NBR 14789 - P2, C2.3, P3, C3.2, P4, C4.1 (Annex 5). P2, C2.3 The organization shall implement forest technology that is suited to local characteristics. P3, C3.2 Forest operations shall be undertaken with protection of remaining ecosystems taken into consideration. Unique ecosystems of environmental,</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				archeological, historical, cultural or social importance shall be preserved. P4, C4.1 Forest management shall be based on environmental planning prior to the area use.
96.		Rec. action 16	Yes	ABNT NBR 14789 - P3, C3.2.e, C3.5; P5, C5.1.d (Annex 5). P3, C3.2 e) existence of mapping, demarcation and protection of historic, archeological sites, and those of cultural and social value; C3.5 Areas of relevant ecological interest, as declared by legislation or recognized for their exceptional natural, sociocultural or environmental attributes, shall be maintained and protected. P5, C5.1. d) evidence that the non-predatory habits and customs of the local, traditional and indigenous communities are being respected;
97.		Rec. action 17	Yes	ABNT NBR 14789 - P3, C3.1.a, c (Annex 5). a) existence of a program implemented to extend the genetic base; c) existence of a program implemented for continuous assessment of alternative genetic materials;
98.		Rec. action 18	Yes	ABNT NBR 14789 - P5, C5.1.a-c (Annex 5). a) evidence of possible influence on the identification of socioeconomic parameters and the resulting impacts; b) evidence to avoid, mitigate or compensate resulting and significant negative socioeconomic impacts; c) evidence of measures to enhance positive socioeconomic impacts;
99.	Socio-economic considerations	Rec. action 19	No	ABNT NBR 14789 - P2, C2.2.a (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. Comment: Standard document does not include any reference to crop diversification mechanisms.



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
100		Rec. action 20	Yes	ABNT NBR 14789 - P2, C2.2.a (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — justification of the economic viability of the management plans;
101	Institutional considerations	Principle 24	Yes	ABNT NBR 14789 - P2, C2.3.a-e (Annex 5). The organization shall implement forest technology that is suited to local characteristics. Indicators: a) evidence that the silvicultural technology employed is based on the results of research and studies performed under conditions similar to those of the forest management unit; b) evidence that documented procedures for the activities of seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material are updated; c) evidence that procedures incorporate shall from the experiments, tests and research performed in the region; d) existence of formal mechanisms of technology transference to the forest workers and to third parties of the own organization; e) evidence of implementation of forest worker training and capacity building programs, with the following objectives: - technical training of forest workers; - avoiding diseases and work accidents; and - minimizing the occurrences of negative environmental impacts;
102		Principle 25	Yes	ABNT NBR 14789 - P5, C5.2.d (Annex 5). d) evidence of good relations with the organizations that represent local society, with government agencies and with related entities. Comment: Not only good relations but also their participation in forest management planning and monitoring should be aimed at. Brazilian legislation requires EIA to be carried out for any activities affecting areas larger than 100 ha, or affecting environmentally important areas. Public hearings are required as a part of EIA process.
103		Rec. action 21	Yes	ABNT NBR 14789 - P5, C5.1 (Annex 5). The forest producer must encourage programs of interest to the community, with a view toward improving the living conditions of the local community. Indicators: a) evidence of possible influence on the identification of socioeconomic parameters and the resulting impacts; b) evidence to avoid, mitigate or compensate resulting and significant negative socioeconomic impacts; c) evidence of measures to enhance positive socioeconomic impacts; d) evidence that the non-predatory habits and cus-



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>toms of the local, traditional and indigenous communities are being respected;</p> <p>e) evidence that the intellectual property of traditional and indigenous populations is being respected.</p> <p>f) evidence that priority is given to the inhabitants of local communities participation in the various activities related to the forest management unit, including the supply of goods and services;</p> <p>g) existence of measures promoting local enterprises;</p> <p>h) existence of implemented health, education, safety and hygiene programs for forest workers, and available for their direct dependents;</p> <p>i) existence of actions promoting environmental education programs in conjunction with the local communities;</p> <p>j) evidence of implemented environmental education programs for forest workers.</p> <p>Comment: Although requiring good relations with local communities and NGOs, the standard does not fully take a participatory approach to the forest management planning and operational planning.</p> <p>Brazilian legislation requires EIA to be carried out for any activities affecting areas larger than 100 ha, or affecting environmentally important areas. Public hearings are required as a part of EIA process.</p> <p>RESOLUÇÃO CONAMA nº 1, 23 January 1986 Art. 11 and RESOLUÇÃO CONAMA no 9, 3 December 1987 Art 1)</p>
Planted forest establishment				
104	Management plan preparation – the importance of management planning	Rec. action 22	Yes	<p>ABNT NBR 14789 - P2 (Annex 5). Forest management shall be planned, either through the use of the services of the own organization or through third parties. The organization must promote and adopt attitudes that encourage the rational use of forest resources, both with regard to raw materials produced, secondary products or services rendered by the forest. The forest shall be managed in such a way that the activity does not lead to the depletion of renewable natural resources.</p> <p>C 2.1 The organization shall adopt strategies oriented to the sustainable use and management of the forest resources.</p> <p>b) evidence that documented procedures for the activities of seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material are updated;</p> <p>c) evidence that procedures incorporate shall from the experiments, tests and research performed in the region;</p> <p>Comment: unclear translation.</p>
105		Rec. action 23.	Yes	<p>ABNT NBR 14789 - P4 (Annex 5). The forest management plan and the technological development program shall foresee and adopt techniques aimed</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>at soil, water, and air resources conservation C 4.1 Forest management shall be based on environmental planning prior to the area use. Indicators: a) documented evidence characterizing the soils existing in the forest management unit; b) documented evidence characterizing water resources, taking into consideration the watershed(s) where the forest management unit is located; c) existence of procedures for selecting and locating planting and road network areas; d) evidence that silvicultural activities are planned and executed by taking local climatic data into consideration; e) evidence that the identification of areas of environmental importance take into consideration the particular properties of soil and water resources of the concerned area. C4.4 The producer shall adopt and implement a policy aimed at reducing or properly treating solid, liquid and gaseous residues. Indicators: a) existence of an implemented system for the selective waste collection; b) evidence that hazardous residues are sent to appropriate treatment; c) evidence that residues and other liquid effluents are treated and disposed in accordance with current legislation; d) existence of plans for controlling or monitoring spills and runoffs; and e) evidence of a program for monitoring and controlling gaseous emissions from vehicles and motorized forestry equipment. P5, C5.1 (Annex 5). The forest producer must encourage programs of interest to the community, with a view toward improving the living conditions of the local community. Indicators: a) evidence of possible influence on the identification of socioeconomic parameters and the resulting impacts; b) evidence to avoid, mitigate or compensate resulting and significant negative socioeconomic impacts; c) evidence of measures to enhance positive socioeconomic impacts; d) evidence that the non-predatory habits and customs of the local, traditional and indigenous communities are being respected; a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: economic viability of the management plans; — contingency plans in the case of fires, disasters and fortuitous events; P3, C 3.3 b) existence of a system for prevention,</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>surveillance and control of forest fires, undertaken on its own or in conjunction with other entities. Deliberated fires must be used under proper technical supervision and effective control measures;</p> <p>c) existence of monitoring and recording of meteorological, pest and disease conditions;</p> <p>d) evidence of procedures aimed at minimizing the use of chemical products in the control of infestation and disease; and</p> <p>e) existence of pest and disease prevention or control measures using natural biological control agents, aside from silvicultural, genetic, physical or mechanical techniques.</p> <p>P3, C3.2 Forest operations shall be undertaken with protection of remaining ecosystems taken into consideration. Unique ecosystems of environmental, archeological, historical, cultural or social importance shall be preserved.</p> <p>Comment: Watershed management requirements do not specifically address a need to establish protective buffer zones but Brazilian legislation (Lei 4771, 1965, Art. 1) sets detailed requirements for water protection measures and buffer zones.</p>
106		Principle 27	Yes	<p>ABNT NBR 14789 - P2, C2.2.a (Annex 5).</p> <p>a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains:</p> <ul style="list-style-type: none"> — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. <p>Comment: evidence of good relations with various stakeholder groups are required in the standard but their involvement in the planning, establishment and forest management planning is not specifically required. Brazilian legislation requires EIA to be carried out for any activities affecting areas larger than 100 ha, or affecting environmentally important areas. Public hearings are required as a part of EIA</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				process. RESOLUÇÃO CONAMA nº 1, 23 January 1986 Art. 11 and RESOLUÇÃO CONAMA no 9, 3 December 1987 Art 1)
107	Management plan preparation – Soil and site considerations	Rec. action 25	Yes	<p>ABNT NBR 14789 - P2, C2.1.a, C2.2a, C2.3a; P4, C4.1.a, c, C4.2.a-d (Annex 5).</p> <p>P2, C2.1 a) existence of procedures aimed at:</p> <ul style="list-style-type: none"> — identify all environmental aspects that can be controlled or influenced, along with the related environmental impacts, — identify and characterize significant environmental impacts, — characterize, assess and establish measures to avoid or minimize negative environmental impacts on the forest management unit. — monitor the implementation of the measures to avoid, mitigate or compensate significant and negative environmental impacts caused by the activity of forest management ; <p>P2, C2.2.a (Annex 5).</p> <p>a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains:</p> <ul style="list-style-type: none"> — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. <p>P2, C2.3 a) evidence that the silvicultural technology employed is based on the results of research and studies performed under conditions similar to those of the forest management unit;</p> <p>C4.1.a) documented evidence characterizing the soils existing in the forest management unit;</p> <p>b) documented evidence characterizing water resources, taking into consideration the watershed(s) where the forest management unit is located;</p> <p>c) existence of procedures for selecting and locating planting and road network areas;</p> <p>C4.2 a) evidence of the adoption of techniques</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				aimed at soil conservation; b) existence of procedures for base or cover fertilization that consider: — the nutritional requirements of the planted species, — the levels of essential elements existing in the soil, — the intrinsic characteristics of each fertilizer, — the existing climatic conditions. c) existence of monitoring of the qualitative and quantitative parameters of the relevant water and soil resources; and d) evidence that the road network and fire breakers are maintained in conditions that do not favor soil erosion.
108		Rec. action 26	Yes	ABNT NBR 14789 - P4, C4.2.b, c (Annex 5). b) existence of procedures for base or cover fertilization that consider: — the nutritional requirements of the planted species, — the levels of essential elements existing in the soil, — the intrinsic characteristics of each fertilizer, — the existing climatic conditions. c) existence of monitoring of the qualitative and quantitative parameters of the relevant water and soil resources;
109		Rec. action 27	Yes	ABNT NBR 14789 - P4, C4.2.a (Annex 5). a) evidence of the adoption of techniques aimed at soil conservation;
110		Rec. action 28	Yes	ABNT NBR 14789 - P4, C4.2.a (Annex 5). a) evidence of the adoption of techniques aimed at soil conservation;
111		Rec. action 29	Yes	ABNT NBR 14789 - P2, C2.1.a, C2.3.f; P4, C4.2.d (Annex 5). P2, C2.1 a) existence of procedures aimed at: — identify all environmental aspects that can be controlled or influenced, along with the related environmental impacts, — identify and characterize significant environmental impacts, — characterize, assess and establish measures to avoid or minimize negative environmental impacts on the forest management unit. — monitor the implementation of the measures to avoid, mitigate or compensate significant and negative environmental impacts caused by the activity of forest management ; C2.3.f) evidence that equipment, machinery and supplies are suited to local conditions of topography, soil, climate and characteristics of produced forest resources. P4, C4.2. d) evidence that the road network and fire breakers are maintained in conditions that do not favor soil erosion.
112		Rec. action 30	Yes	ABNT NBR 14789 - P4, C4.2.a (Annex 5).



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
113		Rec. action 31	Yes	a) evidence of the adoption of techniques aimed at soil conservation; ABNT NBR 14789 - P2, P2.1.d; P3, C3.3.d, e (Annex 5). P2, P2.1 d) existence of documented procedures for seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material activities; P3, C3.3 d) evidence of procedures aimed at minimizing the use of chemical products in the control of infestation and disease; and e) existence of pest and disease prevention or control measures using natural biological control agents, aside from silvicultural, genetic, physical or mechanical techniques.
114	Management plan preparation – research needs	Rec. action 32	Yes	ABNT NBR 14789 - P2, C2.3.a, c (Annex 5). a) evidence that the silvicultural technology employed is based on the results of research and studies performed under conditions similar to those of the forest management unit; c) evidence that procedures incorporate shall from the experiments, tests and research performed in the region;
115		Rec. action 33	Yes	ABNT NBR 14789 – P3, C3.1.a, b; P4, C.4.1a, c, d (Annex 5). P3, C3.1. a) existence of a program implemented to extend the genetic base; b) existence of previous experience or some reference in the region or at the site, attesting the forest production potential of the genetic material for the desired objective; P4, C.4.1 a) documented evidence characterizing the soils existing in the forest management unit; c) existence of procedures for selecting and locating planting and road network areas; d) evidence that silvicultural activities are planned and executed by taking local climatic data into consideration;
116	Choice of site, tree species and planting material	Rec. action 34	Yes	ABNT NBR 14789 - P2, C2.1.b (Annex 5). b) evidence that the forest species are adequate for the envisioned final uses;
117		Rec. action 35	Partly	ABNT NBR 14789 – P3, C3.1.a, b, c (Annex 5). a) existence of a program implemented to extend the genetic base; b) existence of previous experience or some reference in the region or at the site, attesting the forest production potential of the genetic material for the desired objective; c) existence of a program implemented for continuous assessment of alternative genetic materials; Comment: Standard does not particularly require or encourage use and testing of native species.
118		Rec. action 36	Yes	ABNT NBR 14789 - P2, C2.1.a, P3.C3.1.b, c (Annex 5).



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>P2, C2.1. a) existence of procedures aimed at: — identify all environmental aspects that can be controlled or influenced, along with the related environmental impacts, — identify and characterize significant environmental impacts, — characterize, assess and establish measures to avoid or minimize negative environmental impacts on the forest management unit. — monitor the implementation of the measures to avoid, mitigate or compensate significant and negative environmental impacts caused by the activity of forest management; P3.C3.1 b) existence of previous experience or some reference in the region or at the site, attesting the forest production potential of the genetic material for the desired objective; c) existence of a program implemented for continuous assessment of alternative genetic materials; Comment: Cerflor standard does not include a requirement of species/provenances/genotypes mixing.</p>
119	Roads and site protection	Rec. action 37	Yes	<p>ABNT NBR 14789 - P2, C2.1.d, P4, C4.1.c; C4.2.d (Annex 5). P2, C2.1. d) existence of documented procedures for seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material activities; P4, C4.1. c) existence of procedures for selecting and locating planting and road network areas; C4.2.d d) evidence that the road network and fire breakers are maintained in conditions that do not favor soil erosion. Comment: Cerflor standard does not require control of forest road use.</p>
120		Rec. action 38	Yes	<p>ABNT NBR 14789 - P1, C1.1.b, P3, C3.5.a, b (Annex 5). P1, C1.1. b) existence of records providing evidence of compliance with laws and other regulations that are applicable to the establishment and management of the forest management unit. P3, C3.5. a) existence of maps or sketches indicating permanent preservation areas and legal reserves, with their respective identification; b) existence of silvicultural practices or procedures aimed at protecting, restoring and maintaining areas of relevant ecological interest; Comment: Cerflor standard does not require buffer zones for water courses and riparian zones. Brazilian legislation (Lei 4771, 1965, Art. 1) sets detailed requirements for water protection measures and buffer zones.</p>
121		Rec. action 39	Yes	<p>ABNT NBR 14789 - P2, C2.2.a; P3, C3.3.b (Annex 5).</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>P2, C2.2. a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains:</p> <ul style="list-style-type: none"> — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. <p>P3, C3.3. b) existence of a system for prevention, surveillance and control of forest fires, undertaken on its own or in conjunction with other entities. Deliberated fires must be used under proper technical supervision and effective control measures; Comment: Fire management system requirements are not described in detail but the Brazilian legislation describes measures to be included in a fire management plan.</p>
122	Site preparation	Rec. action 40	Yes	<p>ABNT NBR 14789 - P2, C2.2.a; P4, C4.1.a, C4.2.a (Annex 5).</p> <p>P2, C2.2. a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains:</p> <ul style="list-style-type: none"> — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance;



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<ul style="list-style-type: none"> — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. P4, C4.1. a) documented evidence characterizing the soils existing in the forest management unit; C4.2. a) evidence of the adoption of techniques aimed at soil conservation;
123		Rec. action 41	Yes	ABNT NBR 14789 - P2, C2.2.f; C 2.3.d-e (Annex 5). P2, C2.2. f) evidence of the implementation of training and capacity building programs aimed at: <ul style="list-style-type: none"> — professional workers capacitation, — reduction in the number of work-related accidents, — decrease of occurrences placing the integrity of ecosystems at risk. C 2.3.d-e d) existence of formal mechanisms of technology transference to the forest workers and to third parties of the own organization; e) evidence of implementation of forest worker training and capacity building programs, with the following objectives: <ul style="list-style-type: none"> – technical training of forest workers; – avoiding diseases and work accidents; and – minimizing the occurrences of negative environmental impacts; Comment: Requirement to ensure forest workers access to site information is not specified in the standard.
124	Approach to planting	Rec. action 42	Yes	ABNT NBR 14789 - P2, C2.1.b, C2.2.a (Annex 5). P2, C2.1. b) evidence that the forest species are adequate for the envisioned final uses; a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: <ul style="list-style-type: none"> — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance;
125	Fertilisation	Rec. action 43	Yes	ABNT NBR 14789 - P2, C2.1.e; P4. C4.2.b (Annex 5). P2, C2.1. e) existence of a program of reduction or employment of forest harvesting residues.



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				P4. C4.2. b) existence of procedures for base or cover fertilization that consider: — the nutritional requirements of the planted species, — the levels of essential elements existing in the soil, — the intrinsic characteristics of each fertilizer, — the existing climatic conditions. C 4.3 g) existence of chemical product usage procedures that take into consideration climate, soil, and topographical conditions; Comment: Requirement for water protection is very general.
126		Rec. action 44	Yes	ABNT NBR 14789 - P4. C4.2.b (Annex 5). b) existence of procedures for base or cover fertilization that consider: — the nutritional requirements of the planted species, — the levels of essential elements existing in the soil, — the intrinsic characteristics of each fertilizer, — the existing climatic conditions. Comment: synchronization with silvicultural operations is not required in Cerflor standard.
127		Rec. action 45	Yes	ABNT NBR 14789 - P4, C4.2.b, c (Annex 5). b) existence of procedures for base or cover fertilization that consider: — the nutritional requirements of the planted species, — the levels of essential elements existing in the soil, — the intrinsic characteristics of each fertilizer, — the existing climatic conditions. c) existence of monitoring of the qualitative and quantitative parameters of the relevant water and soil resources;
128	Tending and weed control	Rec. action 46	Partly	ABNT NBR 14789 – P2, C2.3.b-c; P3, C3.3.a, d-e (Annex 5). P2, C2.3 b) evidence that documented procedures for the activities of seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material are updated; c) evidence that procedures incorporate shall from the experiments, tests and research performed in the region; P3, C3.3. a) existence of an integrated pests and diseases management plan; b) existence of a system for prevention, surveillance and control of forest fires, undertaken on its own or in conjunction with other entities. Deliberated fires must be used under proper technical supervision and effective control measures; c) existence of monitoring and recording of meteorological, pest and disease conditions;



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				d) evidence of procedures aimed at minimizing the use of chemical products in the control of infestation and disease; Comment: Cerflor standard does not fully recognize and include environmental protective functions and diversity issues of planted forests in Cerflor standard requirements.
129	Pest control and disease management	Rec. action 47	Yes	ABNT NBR 14789 - P3, C3.1.a-c; C3.3.a, d-e (Annex 5). P3, C3.1. a) existence of a program implemented to extend the genetic base; b) existence of previous experience or some reference in the region or at the site, attesting the forest production potential of the genetic material for the desired objective; c) existence of a program implemented for continuous assessment of alternative genetic materials; C3.3. a) existence of an integrated pests and diseases management plan; b) existence of a system for prevention, surveillance and control of forest fires, undertaken on its own or in conjunction with other entities. Deliberated fires must be used under proper technical supervision and effective control measures; c) existence of monitoring and recording of meteorological, pest and disease conditions; d) evidence of procedures aimed at minimizing the use of chemical products in the control of infestation and disease; and e) existence of pest and disease prevention or control measures using natural biological control agents, aside from silvicultural, genetic, physical or mechanical techniques.
130		Rec. action 48	Yes	ABNT NBR 14789 - P3, C3.3.e (Annex 5). e) existence of pest and disease prevention or control measures using natural biological control agents, aside from silvicultural, genetic, physical or mechanical techniques.
131		Rec. action 49	Yes	ABNT NBR 14789 – P3, C.3.2.b (Annex 5). b) layout and planning of forest plantations interspersed with patches of native vegetation, thereby contributing to the formation of ecological corridors for resident and migratory fauna; P3, C3.3.e (Annex 5). e) existence of pest and disease prevention or control measures using natural biological control agents, aside from silvicultural, genetic, physical or mechanical techniques.
132		Rec. action 50	Yes	ABNT NBR 14789 - P3, C.3.3.a (Annex 5). a) existence of an integrated pests and diseases management plan;
133		Rec. action 51	Yes	ABNT NBR 14789 - P1, C1.3.b; P5, C5.1.c, h (Annex 5)



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				b) evidence that all aspects related to labor legislation are in accordance with current legislation, including collective agreements, collective conventions and work regulatory standards; P5, C5.1. c) evidence of measures to enhance positive socioeconomic impacts; h) existence of implemented health, education, safety and hygiene programs for forest workers, and available for their direct dependents;
Planted forest establishment				
134		Rec. action 53	Partly	ABNT NBR 14789 - P2, C2.2.a, C2.3.c (Annex 5). P2, C2.2. a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; C2.3.c) evidence that procedures incorporate shall from the experiments, tests and research performed in the region; Comment: Unclear translation The standard does not directly require forest manager to provide funding for tree planting programs.
135	Institutional considerations	Rec. action 54	Yes	ABNT NBR 14789 - P2, C.2.2.f; C2.3.e (Annex 5). P2, C.2.2 f) evidence of the implementation of training and capacity building programs aimed at: — professional workers capacitation, — reduction in the number of work-related accidents, — decrease of occurrences placing the integrity of ecosystems at risk. C2.3 e) evidence of implementation of forest worker training and capacity building programs, with the following objectives: – technical training of forest workers; – avoiding diseases and work accidents; and – minimizing the occurrences of negative environmental impacts;
136	Social considerations	Rec. action 55	Yes	ABNT NBR 14789 - P5, C5.1.a-b (Annex 5). a) evidence of possible influence on the identification of socioeconomic parameters and the resulting impacts; Comment: Unclear translation b) evidence to avoid, mitigate or compensate resulting and significant negative socioeconomic impacts;
137	Economic considerations	Rec. action 56	Yes	ABNT NBR 14789 – P2, C2.2.a, d (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — justification of the economic viability of the management plans; — continuous forest inventory; and d) evidence that the results of the monitoring are being incorporated into the management plan; Comment: Scope of monitoring should be specified in more detail and extended to cover environmental



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
138		Rec. action 57	Yes	and social issues. ABNT NBR 14789 - P2, C2.2.a (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — justification of the economic viability of the management plans;
139		Rec. action 58	Yes	ABNT NBR 14789 – P5, C5.2.a-b (Annex 5). a) existence of procedures or instruments for clearly and objectively disseminating information regarding activities and means of operation of the forestry enterprise; b) evidence of implemented programs to promote communication on matters of common interest of the organization and stakeholders, both internally and externally; Comment: marketing should be specified as one specific objective of such cooperation.
140	Integrated resource inventories	Rec. action 59	Yes	ABNT NBR 14789 – P2, C2.2.a; P3, C.3.4.a-d; P5, C5.1.a-b, i (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. C.3.4. a) existence of phytosociological surveys and studies on the structure of remaining native vegetation; b) existence of periodic surveys or inventories that are sufficient to detect imbalances in the composition of local wildlife; c) evidence that the results of the periodical surveys and inventories are being incorporated into the management plan; and d) existence of lists of endemic, rare and threatened species occurring in the forest management unit or



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>its vicinity, and about the plans to protect them. a) evidence of possible influence on the identification of socioeconomic parameters and the resulting impacts; Comment: Unclear translation P3, C 3.6 Hunting and fishing activities shall be controlled within the forest management units, in accordance with current legislation. Indicators: a) existence of a hunting and fishing surveillance and control system;</p>
141		Rec. action 60	Partly	<p>ABNT NBR 14789 - P2, C.2.2.a (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — continuous forest inventory; Comment: Continuous inventory does not equal to permanent inventory plots.</p>
142		Rec. action 61	Partly	<p>ABNT NBR 14789 – P2, C2.2.c, e (Annex 5). c) evidence that the multi-annual management plan is being monitored and revised; e) evidence that the management plan is being divulged to and known by forest workers and local communities, except for confidential information that might compromise competitiveness; Comment: information dissemination does not equal to community consultation. Cerflor standard does not require a real interactive consultation process. Annex 7, GUIDANCE FOR THE IMPLEMENTATION OF ABNT NBR 14789 (which does not have normative value) states that: The following procedures may be adopted: - designation of a person responsible for the communication with the interested parties; - establishment of mechanisms of communication with the interested parties such as, for example, public meeting, an ombudsman, Customer Service Center (SAC), internal memos, among others. Brazilian legislation (CONAMA resolutions no 1, 23 January, 1986; and no 9, 3 December 1987) requires that in case forest activities affect more than 100 ha, an EIA is required before authorization. Public hearing should be organized as a part of the EIA process. However, EIA process is not continuous and does not provide for continuous dialogue.</p>
143		Rec. action 62	Yes	<p>ABNT NBR 14789 - P2, C.2.2.a (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit</p>



No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — continuous forest inventory;
144	Timber production	Rec. action 63	Yes	ABNT NBR 14789 - P2, C.2.2.a, c-d (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. c) evidence that the multi-annual management plan is being monitored and revised; d) evidence that the results of the monitoring are being incorporated into the management plan;
145		Rec. action 64	Yes	ABNT NBR 14789 - P2, C.2.2.a (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — age at planned harvest; — growth and production estimates by harvest product type; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — continuous forest inventory; and — indication of alternative sources to those in the management plan for obtaining forest raw materials. Comment: Cerflor standard does not specify AAC but only management plan which includes annual harvesting operations.
146	Restoration and maintenance of soil fertility	Rec. action 65	Yes	ABNT NBR 14789 – P3 C3.2.b; P4. C4.2. a, b (Annex 5). C3.2. b) layout and planning of forest plantations interspersed with patches of native vegetation, thereby contributing to the formation of ecological corri-



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				dors for resident and migratory fauna; P4. C4.2. a) evidence of the adoption of techniques aimed at soil conservation; b) existence of procedures for base or cover fertilization that consider: — the nutritional requirements of the planted species, — the levels of essential elements existing in the soil, — the intrinsic characteristics of each fertilizer, — the existing climatic conditions. C 4.3 g) existence of chemical product usage procedures that take into consideration climate, soil, and topographical conditions;
147		Rec. action 66	Yes	ABNT NBR 14789 - P2, C2.3.f (Annex 5). f) evidence that equipment, machinery and supplies are suited to local conditions of topography, soil, climate and characteristics of produced forest resources.
148	Tending operations and weed control	Rec. action 67	Yes	ABNT NBR 14789 – P4, C4.1.a, b (Annex 5). Criterion 4.2 Water and soil resource conservation, monitoring and maintenance practices shall be adopted. Indicators: a) evidence of the adoption of techniques aimed at soil conservation; b) existence of procedures for base or cover fertilization that consider: — the nutritional requirements of the planted species, — the levels of essential elements existing in the soil, — the intrinsic characteristics of each fertilizer,
149	Thinning and pruning	Rec. action 68	Yes	ABNT NBR 14789 - P2,C2.2.a (Annex 5). a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — age at planned harvest; — growth and production estimates by harvest product type; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance;
150	Roading	Rec. action 69	Yes	ABNT NBR 14789 – P.2, C2.1.d, C2.2.a; P4, C4.1.c (Annex 5). P.2, C2.1. d) existence of documented procedures for seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material activities; C2.2. a) existence of a documented management



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>plan with defined objectives, which is compatible to the scale of the enterprise, and which contains:</p> <ul style="list-style-type: none"> — management conditions according to regional and local circumstances; — silvicultural management scheme to be implemented; — justification of the economic viability of the management plans; — road network system; — age at planned harvest; — growth and production estimates by harvest product type; — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; — existence of a multi-annual program for planting or re-planting, harvesting and maintenance; — contingency plans in the case of fires, disasters and fortuitous events; — continuous forest inventory; <p>P4, C4.1. c) existence of procedures for selecting and locating planting and road network areas;</p>
151		Rec. action 70	Yes	<p>ABNT NBR 14789 – P2, C2.1.d; P4, C4.2.d (Annex 5). P2, C2.1. d) existence of documented procedures for seedling production, tree planting, replanting, silvicultural treatments, road construction and maintenance, harvesting and transportation of forest raw material activities; P4, C4.2. d) evidence that the road network and fire breakers are maintained in conditions that do not favor soil erosion.</p>
152	Forest protection – control of access	Rec. action 71	Partly	<p>ABNT NBR 14789 – P3, C3.2.d, C3.6a-d (Annex 5). C3.2. d) evidence of restricted access and implementation of surveillance in areas where threatened species occur; C3.6 a) existence of a hunting and fishing surveillance and control system; NOTE It is assumed that the activities above mentioned are performed in conjunction with the related agencies. b) existence of signage and notification instruments regarding the control of hunting and fishing; c) existence of measures favoring the reproduction and movement of local wild animals; and d) existence of information for employees regarding the control of hunting and fishing.</p> <p>Comment: Cerflor standard does not enhance or introduce areal zoning approach where different zones are established to provide basic needs and to protect forest reserves</p>
153	Protection from	Rec. action 72	Yes	ABNT NBR 14789 –



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
	fire			P3, C3.3.b; P2, C 2.1 e (Annex 5). b) existence of a system for prevention, surveillance and control of forest fires, undertaken on its own or in conjunction with other entities. Deliberated fires must be used under proper technical supervision and effective control measures; P2, C 2.1 e) existence of a program of reduction or employment of forest harvesting residues.
154	Pest disease and fire management	Rec. action 73	Yes	ABNT NBR 14789 – P3, C3.3.a,c-e; P4, C4.4.d; P2, C 2.1 e (Annex 5). Criterion 3.3 Forest protection techniques and integrated management of pests and diseases techniques shall be adopted. a) existence of an integrated pests and diseases management plan; c) existence of monitoring and recording of meteorological, pest and disease conditions; d) evidence of procedures aimed at minimizing the use of chemical products in the control of infestation and disease; and e) existence of pest and disease prevention or control measures using natural biological control agents, aside from silvicultural, genetic, physical or mechanical techniques. P4, C4.4 d) existence of plans for controlling or monitoring spills and runoffs; P2, C 2.1 e) existence of a program of reduction or employment of forest harvesting residues.
155		Rec. action 74	Yes	ABNT NBR 14789 - P3, C3.3.b (Annex 5). b) existence of a system for prevention, surveillance and control of forest fires, undertaken on its own or in conjunction with other entities. Deliberated fires must be used under proper technical supervision and effective control measures;
156	Harvesting and planning of the subsequent rotation	Rec. action 75	Partly	ABNT NBR 14789 - P3, C3.2.b (Annex 5). b) layout and planning of forest plantations interspersed with patches of native vegetation, thereby contributing to the formation of ecological corridors for resident and migratory fauna; Comment: Cerflor standard for planted forest does not encourage or require development of multi-species plantation establishment.
Additional PEFC requirements for forest management of natural tropical forests ^[4]				
157	PEOLG	2.2b	Yes	ABNT NBR 14789 – P2, C2.1.b; C2.3.a, f P.4, C4.1.d, e; C4.2.a, d; C4.4 (Annex 5). P2, C2.1. b) evidence that the forest species are adequate for the envisioned final uses; C 2.3 a) evidence that the silvicultural technology employed is based on the results of research and studies performed under conditions similar to those



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>of the forest management unit; f) evidence that equipment, machinery and supplies are suited to local conditions of topography, soil, climate and characteristics of produced forest resources. P.4, C.4.1. d) evidence that silvicultural activities are planned and executed by taking local climatic data into consideration; e) evidence that the identification of areas of environmental importance take into consideration the particular properties of soil and water resources of the concerned area. C.4.2. a) evidence of the adoption of techniques aimed at soil conservation; d) evidence that the road network and fire breakers are maintained in conditions that do not favor soil erosion. C4.4 The producer shall adopt and implement a policy aimed at reducing or properly treating solid, liquid and gaseous residues.</p>
158		4.2f	Yes	<p>ABNT NBR 14789 – P2, C2.1.a; C2.2.a; C2.3.a, f P 3, C.3.2.c, d, f; C3.5.a; P4, C4.1.c; C4.2.a, c, d (Annex 5). P2, C2.1. a) existence of procedures aimed at: – identify all environmental aspects that can be controlled or influenced, along with the related environmental impacts, – identify and characterize significant environmental impacts, – characterize, assess and establish measures to avoid or minimize negative environmental impacts on the forest management unit. – monitor the implementation of the measures to avoid, mitigate or compensate significant and negative environmental impacts caused by the activity of forest management ; C2.2. a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: – management conditions according to regional and local circumstances; – road network system; – maps or sketches of the forest management unit with indications of land use and occupation; – land survey data, classes and types of soils and vegetation, as well as available water resources; C2.3. a) evidence that the silvicultural technology employed is based on the results of research and studies performed under conditions similar to those of the forest management unit; f) evidence that equipment, machinery and supplies are suited to local conditions of topography, soil, climate and characteristics of produced forest resources. P 3, C.3.2 c) existence of mapping or demarcation</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>of <i>habitats</i> of endemic, rare and threatened species; d) evidence of restricted access and implementation of surveillance in areas where threatened species occur; f) identification of the existing conservation units in areas influenced by the production activity; C3.5. a) existence of maps or sketches indicating permanent preservation areas and legal reserves, with their respective identification; P4, C4.1. c) existence of procedures for selecting and locating planting and road network areas; C4.2. a) evidence of the adoption of techniques aimed at soil conservation; c) existence of monitoring of the qualitative and quantitative parameters of the relevant water and soil resources; and d) evidence that the road network and fire breakers are maintained in conditions that do not favor soil erosion.</p>
159		4.2i	Yes	<p>ABNT NBR 14789 – P2, C2.1.a; C2.2.a; P3, C3.5.a, b; P4, C4.1c, e (Annex 5). P2, C2.1. a) existence of procedures aimed at: – identify all environmental aspects that can be controlled or influenced, along with the related environmental impacts, – identify and characterize significant environmental impacts, – characterize, assess and establish measures to avoid or minimize negative environmental impacts on the forest management unit. – monitor the implementation of the measures to avoid, mitigate or compensate significant and negative environmental impacts caused by the activity of forest management ; C2.2. a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: – maps or sketches of the forest management unit with indications of land use and occupation; – land survey data, classes and types of soils and vegetation, as well as available water resources; P3, C3.5. a) existence of maps or sketches indicating permanent preservation areas and legal reserves, with their respective identification; b) existence of silvicultural practices or procedures aimed at protecting, restoring and maintaining areas of relevant ecological interest; P4, C4.1 c) existence of procedures for selecting and locating planting and road network areas; e) evidence that the identification of areas of environmental importance take into consideration the particular properties of soil and water resources of the concerned area.</p>
160		6.1a	Yes	<p>ABNT NBR 14789 – P2, C2.1.c, C2.2.a; P5, C5.1 (Annex 5).</p>



Indufor

Annex 1

No.	Question	Reference to the doc.	YES / NO*	Reference to scheme documentation
				<p>P2, C2.1. c) evidence of adopting practices that show efficient use of produced forest resources; C2.2. a) existence of a documented management plan with defined objectives, which is compatible to the scale of the enterprise, and which contains: — maps or sketches of the forest management unit with indications of land use and occupation; — land survey data, classes and types of soils and vegetation, as well as available water resources; P5, C5.1 The forest producer must encourage programs of interest to the community, with a view toward improving the living conditions of the local community. Indicators: a) evidence of possible influence on the identification of socioeconomic parameters and the resulting impacts; b) evidence to avoid, mitigate or compensate resulting and significant negative socioeconomic impacts; c) evidence of measures to enhance positive socioeconomic impacts; d) evidence that the non-predatory habits and customs of the local, traditional and indigenous communities are being respected; e) evidence that the intellectual property of traditional and indigenous populations is being respected. f) evidence that priority is given to the inhabitants of local communities participation in the various activities related to the forest management unit, including the supply of goods and services; g) existence of measures promoting local enterprises; h) existence of implemented health, education, safety and hygiene programs for forest workers, and available for their direct dependents; i) existence of actions promoting environmental education programs in conjunction with the local communities; j) evidence of implemented environmental education programs for forest workers.</p>



Indufor

Annex 1

PART VI: MINIMUM REQUIREMENTS CHECKLIST FOR SCHEME SPECIFIC CHAIN OF CUSTODY STANDARDS (ANNEX 4)

Part IV is not applicable for the Cerflor Scheme because the Scheme has adopted the international PEFC chain-of-custody standard.



Indufor

Annex 1

PART VII: MINIMUM REQUIREMENTS CHECKLIST FOR CERTIFICATION AND ACCREDITATION PROCEDURES (ANNEX 6)

1 SCOPE

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

2 CHECKLIST

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
1.	Does the scheme documentation require that certification shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making body, or in the forest management and are independent of the certified entity?	Annex 6, 3.1	Yes	The standard setting process is governed by ABNT as a National Standardization body (Annex 1). Official accrediting agency is Inmetro. In order to grant the impartiality and independence of certification of forestry management, the Cerflor's certifying bodies must be in accordance with the NIT-Dicor 053 – ver.08, item 9.2 (Annex 4) and ISO 17021; and for certification of the chain of custody, the Cerflor's certifying bodies must be in accordance with the NIT-Dicor-024-ver.02, item 8.1 (Annex 29), and ISO Guide 65.
2.	Does the scheme documentation require that certification body for forest management certification or chain of custody (CoC) certification against a scheme specific chain of custody standard shall fulfil requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 3.1	Yes	In order to grant the impartiality and independence of certification of forestry management, the Cerflor's certifying bodies must be in accordance with the NIT-Dicor 053 – ver.08, item 9.2 (Annex 4) and ISO 17021; and for certification of the chain of custody, the Cerflor's certifying bodies must be in accordance with the NIT-Dicor-024-ver.02, item 8.1 (Annex 29), and ISO Guide 65.
3.	Does the scheme documentation require that certification body chain of custody certification against Annex 4 shall fulfil requirements defined in ISO Guide 65?	Annex 6, 3.1	Yes	For certification of the chain of custody, the Cerflor's certifying bodies must be in accordance with the NIT-Dicor-024-ver.02, item



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				8.1 (Annex 29), and ISO Guide 65.
4.	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?	Annex 6, 3.1	Yes	In order to grant certification of forestry management, the Cerflor's certifying bodies must be in accordance with the NIT-Dicor 053 - ver.08, item 9.3 (Annex 4) and ISO 17021 and ABNT NBR 14793-Guidelines for Forest Auditing -Auditing procedures – Qualification Criteria for Forest Auditors (Annex 22).
5.	Does the scheme documentation require that certification bodies carrying out CoC certifications shall have technical competence in forest based products procurement and processing and material flows in different stages of processing and trading?	Annex 6, 3.1	Yes	<p>ABNT ISO/IEC Guidance 65:1997 requires technical competence.</p> <p>Inmetro Administrative Directive N°. 369/09 – RAC (Annex 30) 10 Qualifications of the auditors 10.1 The qualification of auditors and specialists of the certification Governing Body of the product for the scope of chain of custody according to ABNT NBR 14790:2007 and Technical Document of PEFC Annex 4 shall meet the requirements of the provisions of ABNT NBR 14793:2001 and ABNT NBR ISO 19011:2002. 10.2 The professionals shall meet the requirements of to the Code of Ethics for the Forest Auditors, provided in Annex C of this document.</p> <p><i>ABNT NBR 14793 (Annex 22): 4 Education and Professional Experience</i> It is recommended that auditors have, as a minimum, completed secondary school and have training in forest management related areas. It is recom-</p>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				<p>mended that auditors have appropriate professional experience, which contributes to the development of skills and expertise in one or more of the following subjects:</p> <ul style="list-style-type: none"> a) forest science and technology; b) economic, social, environmental and technical aspects of forest management; c) applicable legal requirements, regulations and related documents; d) forest management standards and standards in relation to which audits are conducted; e) audit procedures, processes and techniques.
6.	<p>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 CoC certifications?</p>	Annex 6, 3.1	Yes	<p>Specific criteria is established for planted and native forest management certification bodies for certification carried out in compliance to NBR 14789 and the NBR 15789 (Annex 4).</p> <p>Annex 4, 9.3 The forest management certification body auditors and experts as far as NBR 14789 or NBR 15789 must meet the requirements contained in the NBR ISO 19011 as well as the specific requirements contained in the NBR 14793. Administrative Directive N°. 369/09 -RAC item 10.1, 10.2, 10 Qualifications of the auditors 10.1 The qualification of auditors and specialists of the certification Governing Body of the product for the scope of chain of custody according to ABNT NBR 14790:2007 and Technical Document of PEFC Annex</p>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				<p>4 shall meet the requirements of the provisions of ABNT NBR 14793:2001 and ABNT NBR ISO 19011:2002.</p> <p>10.2 The professionals shall meet the requirements of to the Code of Ethics for the Forest Auditors, provided in Annex C of this document.</p> <p>11.2.1 11.2 Obligations of the CAB</p> <p>11.2.1 Implement the conformity assessment program foreseen in this document according to the requirements set forth herein, obligatorily resolving any questions with INMETRO.</p> <p>and Annex C (Annex 30), respectively.</p>
7.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification?	Annex 6, 3.2	Yes	<p>In the case of certification of forestry management, the NIT-Dicor 053, item 9.3 (Annex 4: 9.3 “The forest management certification body auditors and experts as far as NBR 14789 or NBR 15789 must meet the requirements contained in the NBR ISO 19011 as well as the specific requirements contained in the NBR 14793.”), as well as ABNT NBR 14793 (Annex 22), establishes the certification bodies for Forest Management – OCF’s responsibilities regarding using competent auditors. For certification of the chain of custody, these responsibilities are described in the ISO/IEC 65 Guide and in the Inmetro Administrative Directive N°.369/09 - RAC, item 10.1, 10.2 (Annex 30) and Annex C (Annex 30).</p> <p>Annex 30: 10.1 The quali-</p>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				<p>fication of auditors and specialists of the certification Governing Body of the product for the scope of chain of custody according to ABNT NBR 14790:2007 and Technical Document of PEFC Annex 4 shall meet the requirements of the provisions of ABNT NBR 14793:2001 and ABNT NBR ISO 19011:2002.</p> <p>10.2 The professionals shall meet the requirements of to the Code of Ethics for the Forest Auditors, provided in Annex C of this document.</p> <p>ABNT NBR 14793 (Annex 22) recommends that auditors have appropriate professional experience, which contributes to the development of skills and expertise in one or more of the following subjects:</p> <ul style="list-style-type: none"> a) forest science and technology; b) economic, social, environmental and technical aspects of forest management; c) applicable legal requirements, regulations and related documents; d) forest management standards and standards in relation to which audits are conducted; e) audit procedures, processes and techniques.
8.	Does the scheme documentation require that the auditors must fulfil the general criteria of ISO 19011 for Quality Management Systems auditors or for Environmental Management Systems auditors?	Annex 6, 3.2	Yes	In the case of certification of forestry management, the NIT-Dicor 053, item 9.3 (Annex 4), requires that the auditors must fulfil the ISO 19011. For certification of the chain of custody, these responsibilities are described in the Inmetro Administrative Directive N°. 369/09 - RAC, item



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				10.1 (Annex 30: The qualification of auditors and specialists of the certification Governing Body of the product for the scope of chain of custody according to ABNT NBR 14790:2007 and Technical Document of PEFC Annex 4 shall meet the requirements of the provisions of ABNT NBR 14793:2001 and ABNT NBR ISO 19011:2002.”).
9.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management or chain of custody audits? ^[*1]	Annex 6, 3.2	Yes	Annex 22 and 30 describe additional qualification criteria for auditors.
Certification procedures				
10.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management and/or chain of custody certification?	Annex 6, 4	Yes	<p>Cerflor requires that the Certification Bodies for Forest Management – OCF must satisfy the ISO 17021, as contained in NIT – Dicor – 053, item 9.2 and 9.4.1(Annex 4). And, the Certification Bodies for certification of the chain of custody, must satisfy the ISO/IEC 65 Guide, (including item 4.8, 4.8.1, letter “c”), according to Inmetro Administrative .</p> <p>Given that these certification bodies are accredited either based on ABNT NBR ISO/IEC Guia 65 or on ABNT NBR ISO/IEC 17021, the certification bodies of forest management must produce evidence that they have established internal procedures for forest management certification in accordance with ABNT NBR ISO/IEC 17021, item 8.1, and the certification bodies of chain of custody that they have established internal procedures for chain of custody certification in accordance with ABNT</p>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				NBR ISO/IEC Guia 65, item 4.8. The accreditation body carries out annual on-site surveillance assessments as to monitor the continuous accomplishment of the certification requirements.
11.	Does the scheme documentation require that applied certification procedures for forest management certification or chain of custody certification against a scheme specific chain of custody standard shall fulfil or be compatible with the requirements defined in ISO 17021 or ISO Guide 65?	Annex 6, 4	Yes	Cerflor requires in NIT – Dicor – 053, item 9.2 and 9.4.1(Annex 4) that the Certification Bodies must comply with the ISO 17021, for certification of forestry management The CAB shall act in agreement with the requirements set forth in ABNT ISO IEC Guidance 65 in addition to those of this document.).
12.	Does the scheme documentation require that applied certification procedures for chain of custody certification against Annex 4 shall fulfil or be compatible with the requirements defined in ISO Guide 65?	Annex 6, 4	Yes	Certification Bodies must comply with the ISO/IEC 65 Guide (Annex 30: Directive no. 369/09 - RAC, 5.4)
13.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	Yes	Cerflor requires that the Certification Bodies for the certification of the chain of custody must be compatible with the ISO 19011, according to NIT Dicor 053, item 9.3 (Annex 4) and to Inmetro Administrative Directive no. 369/09 - RAC, item 10.1 (Annex 30).
14.	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?	Annex 6, 4	Yes	Cerflor requires that the Certification Bodies for the certification of the SFM and C-o-C must inform the Cerflor Secretary (PEFC National Secretary) about the certifications of forest management , according to NIT-Dicor 053 (Annex 4), item 9.4.9 and about the certifications of chain of custody, according to Inmetro Administrative Directive no. 369/09 - RAC, item 6.1.5.8 (Annex 30)
15.	Does the scheme documentation require that certification body shall carry out controls of PEFC	Annex 6, 4	Yes	Cerflor requires that the Certification Bodies shall



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
	logo usage if the certified entity is a PEFC logo user?			carry out controls to PEFC logo usage according to Inmetro Administrative Directive no. 369/09 - RAC, item 8.2 (Annex 30).
16.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	Yes	Cerflor requires that a maximum period for surveillance audits does not exceed one year according to ISO 17021 item 9.3.2.2 and Inmetro Administrative Directive no. 369/09 - RAC, item 6.2.1.2 (Annex 30).
17.	Does a maximum period for assessment audit not exceed five years for both forest management and chain of custody certifications?	Annex 6, 4	Yes	The maximum period of assessment audit is 5 years. Forestry management, NIT-Dicor 053 - item 9.4.4 (Annex 4) and for the certification of the chain of custody, Inmetro Administrative Directive N°. 369/09 - RAC - item 5.5 (Annex 30).
18.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	Yes	Certification report summaries must be publicly available: Certification of forestry management, NIT-Dicor 053 – item 9.4.2 and 9.4.5 (Annex 4). For the certification of the chain of custody, Inmetro Administrative Directive N°. 369/09 - RAC - item 6.1.5.2 and Annex D (Annex 30).
19.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	Yes	Audit must include feedback and comment as audit evidence. For the certification of forestry management, NIT-Dicor 053 - item 9.4.2.2. and 9.4.2.4 (Annex 4). In the case of the certification of the chain of custody, consider Inmetro Administrative Directive N°. 369/09 - RAC - item 6.1.5.3 (Annex 30: “ The CAB shall set up a Certification Commission composed of representatives of parties interested in the process, with no individual interest. The Certificate Commission



No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				shall have as its objective recommending to the CAB the concession or not of the certificate”).
20.	Does the scheme documentation include additional requirements for certification procedures? ^[*1]	Annex 6, 4	Yes	Cerflor has NIT-Dicor 053 (Annex 4), for the case of the certification of forestry management, and Inmetro Administrative Directive N°. 369/09 - RAC (Annex 30) for the case of the certification of the chain of custody as supplemental documents to the Brazilian Standards established by the ABNT (and PEFC TD Annex 4), which are the documents that establish the requirements for certification procedures.
Accreditation procedures				
21.	Does the scheme documentation require that certification bodies carrying out forest management and/or chain of custody certification shall be accredited by a national accreditation body?	Annex 6, 5	Yes	Cerflor uses the structure of the Brazilian System of Conformity Assessment – SBAC which includes the national accreditation body as established in the Conmetro Resolution N°. 04/02, item 4.2 (Annex 3). 4.2 It is competence of INMETRO: c) Perform the function of accreditation body of SBAC1, in a transparent, indiscriminate and independent way, in harmony with the international practices in vigor and in conformity with the principles and policies defined by CONMETRO; d) Adopt principles, implement actions due to the policy definitions, establish criteria and prepare the necessary documents to the accreditation of bodies of Conformity Assessment within the scope of SBAC; e) Articulate itself, within the scope of the Govern-

¹ SBAC – Brazilian Conformity Assessment System



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				<p>ment, with different agents of existent conformity assessment systems, seeking for their compatibility;</p> <p>f) Establish guidelines and criteria for the activity of conformity assessment;</p> <p>g) Manage the concession and use of marks of conformity assessment within the scope of SBAC, guaranteeing its unique identity;</p> <p>h) Coordinate the implementation of conformity assessment programs within the scope of SBAC;</p> <p>i) Organize Technical Committees, in the development of Conformity Assessment Programs, having the participation of all representative entities of interested parties in the issue in question, to propose the content of basic elements of the program.</p>
22.	<p>Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?</p>	Annex 6, 5	Yes	<p>The NIE-Cgcre-009-rev.07, (Annex 31), establishes the criteria for identification of the certification within the Brazilian System of Conformity Assessment – SBAC and requires that the certificate shall bear an accreditation symbol. Logo usage is further guided by Inmetro Administrative Directive Nº 179, 06/16/09 (Annex 32).</p>
23.	<p>Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF's special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?</p>	Annex 6, 5	Yes	<p>Conmetro Resolution Nº. 04/02 (Annex 3), establishes the Term of Reference of the Brazilian System of Conformity Assessment - SBAC, where Inmetro is the only national accrediting body. Being recognized by the IAF, Inmetro/Cgcre satisfies the requirements of ISO 17011. For its part, Cerflor is managed by Inmetro, and despite the fact that</p>



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				forestry management is not within the scope of recognition given by the IAF, it nevertheless seeks to satisfy the international requirements for accreditation.
24.	Does the scheme documentation require that certification body undertake forest management or/and chain of custody certification against a scheme specific chain of custody standard as “accredited certification” based on ISO 17021 or ISO Guide 65 and the relevant forest management or chain of custody standard(s) shall be covered by the accreditation scope?	Annex 6, 5	Yes	<p>Annex 4: 9.2 The accreditation criteria for a forest management certification body as far as NBR 14789 or NBR 15789 are established in ABNT NBR ISO/IEC 17021 and in the 9.4 item of the present Standard.</p> <p>Annex 30: 5.4 The CAB shall act in agreement with the requirements set forth in ABNT ISO IEC Guidance 65 in addition to those of this document.</p> <p>Certificates based on CERFLOR scheme are only being issued by certification bodies accredited by Cgcre-Inmetro (NIT-DICOR-024, item 8.1, and “Portaria Inmetro nº 297 de 2010”, art. 3rd, for chain of custody certification, and NIT-DICOR-008, item 8.1) for forest management certification.</p>
25.	Does the scheme documentation require that certification body undertake chain of custody certification against Annex 4 as “accredited certification” based on ISO Guide 65?	Annex 6, 5	Yes	<p>The Cerflor requires that the Certification Bodies for the certification of the chain of custody must comply with ISO 65, according to Inmetro Administrative Directive N°. 369/09 – RAC, item 5.4 (Annex 30), and also the NIE-Cgcre-024, item 8.1 (Annex 29) establishes this basis for the accreditation of certification body of products, including chain of custody.</p>
26.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	Partly	Notification is the responsibility of, and being realized by, the PEFC national governing body or the



Indufor

Annex 1

No.	Question	Reference to PEFC Council doc.	YES / NO*	Reference to scheme documentation
Certification Bodies				
				Dqual/Inmetro. Scheme documentation does not include mechanism description for PEFC notification but the mechanism is an internal rule of Dqual/Inmetro.
27.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	Yes	Notification is the responsibility of, and being realized by, the PEFC national governing body or the Dqual/Inmetro. Scheme documentation does not include mechanism description for PEFC notification but the mechanism is an internal rule of Dqual/Inmetro (administrative guideline). Procedures of notification are non-discriminatory.

* If the answer to any question is no, the application documentation shall indicate for each element why and what alternative measures have been taken to address the element in question.
 [*1] This is not an obligatory requirement

Annex 2

Stakeholder questionnaire



PEFC Cerflor: Questionário

Manejo Florestal Princípios, critérios e indicadores para plantações florestais (NBR 14789:2007)

1. **Você foi convidado para participar da revisão do Cerflor que resultou na norma NBR 14789:2007 - Manejo Florestal - Princípios, critérios e indicadores para plantações florestais.**

Sim	Não	Comentários

2. **Em sua opinião, a todos os atores relevantes foi dada a possibilidade de participar e contribuir para o desenvolvimento da norma?**

Sim	Não	Comentários

3. **Você recebeu todo o material relevante para participar no desenvolvimento da norma?**

Sim	Não	Comentários



4. O processo de revisão da norma foi bem planejado e estruturado?

Sim	Não	Comentários

5. As suas opiniões foram consideradas apropriadas durante o processo de desenvolvimento?

Sim	Não	Comentários

6. Chegou-se a um consenso no desenvolvimento dos critérios de certificação?

Sim	Não	Comentários



7. As partes interessadas que participaram do processo representam todos os interesses ligados ao manejo florestal no Brasil? Quais outros grupos de interesse deveriam ter participado?

Sim	Não	Comentários e propostas

8. Você acredita que algum dos aspectos do esquema merecia ter dito uma análise mais aprofundada?

Sim	Não	Comentários e propostas

Qual dos atores listados abaixo melhor descreve você ou sua organização?

X	Representado:
	Governo
	Organização Não Governamental com foco ambiental (ONG-Ambiental)
	Organização Não Governamental com foco social (ONG-Social)
	Proprietário/administrador de área florestal
	Instituto de pesquisa
	Indústria florestal
	Comércio
	Outro. Qual?



PEFC Cerflor: Questionário

Manejo Florestal
Princípios, Critérios e Indicadores para florestas nativas
(NBR 15789:2008)

- 1. Você foi convidado para participar do desenvolvimento da norma NBR 15789:2008 sobre manejo florestal em florestas nativas?**

Sim	Não	Comentários

- 2. Em sua opinião, a todos os atores relevantes foi dada a possibilidade de participar e contribuir para o desenvolvimento da norma?**

Sim	Não	Comentários

- 3. Você recebeu todo o material relevante para participar do desenvolvimento da norma?**

Sim	Não	Comentários



4. O desenvolvimento da norma foi bem planejado e estruturado?

Sim	Não	Comentários

5. As suas opiniões foram consideradas apropriadas durante o processo de desenvolvimento?

Sim	Não	Comentários

6. Chegou-se a um consenso no desenvolvimento dos critérios de certificação?

Sim	Não	Comentários



7. As partes interessadas que participaram do processo representam todos os interesses ligados ao manejo florestal no Brasil? Quais outros grupos de interesse deveriam ter participado?

Sim	Não	Comentários e propostas

8. Você acredita que algum dos aspectos do esquema merecia ter dito uma análise mais aprofundada?

Sim	Não	Comentários e propostas

Qual dos atores listados abaixo melhor descreve você ou sua organização?

X	Representado:
	Governo
	Organização Não Governamental com foco ambiental (ONG-Ambiental)
	Organização Não Governamental com foco social (ONG-Social)
	Proprietário/administrador de área florestal
	Instituto de pesquisa
	Indústria florestal
	Comércio
	Outro. Qual?



Indufor ...forest intelligence

Indufor Oy
Töölönkatu 11 A
FI-00100 Helsinki
Finland

Tel. +358 9 684 0110
Fax +358 9 135 2552
indufor@indufor.fi
www.indufor.fi

