

Addressing Non-conformities Raised in PEFC CH

No.	PEFC Requirement	PEFC CH Standard & Documents	Assessor's Comment	Response Submitted	Amendments to address NC (Incorporating feedback from PEFC)
Addressing Non-conformities Raised in VL_004_Standard_revision_procedures					
1	PEFC ST 1001, 6.2.1: The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the standardising body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.	VL004 / 4.2.2. Identification of need for revision	From the evidence provided on the revision process it is not apparent that it was defined why stakeholder groups are relevant and what their key issues are. Nonconformity with PEFC ST 1001:2017, 6.2.1, Process	The experience with the last re-endorsement process revealed little interest from stakeholders in the revision process. A reason may be that there is little continuous communication between the PEFC Switzerland office and the stakeholder groups. Therefore, the time between the re-endorsements shall be used to improve the stakeholder relations and to obtain a better understanding of their needs. The expectations of stakeholders as well as their key issues in relation to PEFC shall be determined through annual surveys, phone calls or at suitable events to create a better understanding of their representation within PEFC. The respective results shall be documented and included in the standard revision process. The Mandatory Guideline VL 004 was adapted. (Chapter 4.2.2, footnote added) Document name: VL_004_Standard_revision_procedures_20220103.	4.2.2. Identification of need for revision* * Improvement of the stakeholder mapping processes The re-endorsement shall be used to improve the understanding of needs of and collaboration between stakeholders and PEFC Switzerland. Therefore, the stakeholder mapping shall be started approximately three months before starting the revision process and at least during the gap analysis to ensure enough time for contacting the stakeholders and identifying key issues regarding adaptations in the standards. In a first step, key issues per stakeholder group as well as key stakeholders shall be identified by the PEFC office. To do so, recent events and developments regarding sustainable forestry, labour and the forestry and wood value chain shall be analysed (through the lecture of press releases, recent activities, recent political developments and statements related to the above). These findings shall be documented. In a second step, it shall be reached out to the stakeholders by means of a survey asking for their specific needs and requirements to adaptations in the PEFC standards. The key issues previously identified shall be discussed and/or included in the survey. The survey can be conducted online or telephonically and the results shall be documented. Additionally, the survey shall aim to identify further affected stakeholders and/or the issues relevant to the respective groups and the findings shall be documented. The aim of the survey is to show interest in the stakeholders' issues and create a bond of collaboration and mutual understanding between them and the national PEFC office.
2	PEFC ST 1001, 6.4.2: The working group shall: a) have balanced representation and decision-making by stakeholder categories, relevant to the subject matter and geographical scope of the standard, where no single concerned stakeholder group can dominate, nor be dominated in the process, and (...)	VL004 / 4.2.2. Identification of need for revision	PEFC Switzerland did not achieve the balanced representation of all stakeholder categories in the working group. Forest owners were over-represented. ENGOs and trade unions were not directly represented in the working group, although PEFC Switzerland considered the former to have been represented through an environmental consultant also representing the stakeholder category science, and the latter to have been represented by a representative of the wood industry often consulting with trade unions. A certification body was on the group, but did not participate in the working group meeting. Government/authorities declined to participate. Therefore, the PEFC Benchmark requirement for balanced representation of stakeholders in the working group has not been met. Nonconformity with PEFC ST 1001:2017, 6.4.2a, Process	The re-endorsement shall be used to improve the understanding of needs of and collaboration between stakeholders and PEFC Switzerland. Therefore, the stakeholder mapping shall be started approximately three months before starting the revision process and at least during the gap analysis to ensure enough time for contacting the stakeholders and identifying key issues regarding adaptations in the standards. In a first step, key issues per stakeholder group as well as key stakeholders shall be identified by the PEFC office. To do so, recent events and developments regarding sustainable forestry, labour and the forestry and wood value chain shall be analysed (through the lecture of press releases, recent activities, recent political developments and statements related to the above). These findings shall be documented. In a second step, it shall be reached out to the stakeholders by means of a survey asking for their specific needs and requirements to adaptations in the PEFC standards. The key issues previously identified shall be discussed and/or included in the survey. The survey can be conducted online or telephonically and the results shall be documented. Additionally, the survey shall aim to identify further affected stakeholders and/or the issues relevant to the respective groups and the findings shall be documented. The aim of the survey is to show interest in the stakeholders' issues and create a bond of collaboration and mutual understanding between them and the national PEFC office. The Mandatory Guideline VL 004 was adapted. (Chapter 4.2.2, footnote added) Document name: VL_004_Standard_revision_procedures_20220103.	4.2.2. Identification of need for revision* * Improvement of the stakeholder mapping processes The re-endorsement shall be used to improve the understanding of needs of and collaboration between stakeholders and PEFC Switzerland. Therefore, the stakeholder mapping shall be started approximately three months before starting the revision process and at least during the gap analysis to ensure enough time for contacting the stakeholders and identifying key issues regarding adaptations in the standards. In a first step, key issues per stakeholder group as well as key stakeholders shall be identified by the PEFC office. To do so, recent events and developments regarding sustainable forestry, labour and the forestry and wood value chain shall be analysed (through the lecture of press releases, recent activities, recent political developments and statements related to the above). These findings shall be documented. In a second step, it shall be reached out to the stakeholders by means of a survey asking for their specific needs and requirements to adaptations in the PEFC standards. The key issues previously identified shall be discussed and/or included in the survey. The survey can be conducted online or telephonically and the results shall be documented. Additionally, the survey shall aim to identify further affected stakeholders and/or the issues relevant to the respective groups and the findings shall be documented. The aim of the survey is to show interest in the stakeholders' issues and create a bond of collaboration and mutual understanding between them and the national PEFC office.

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3	PEFC ST 1001, 6.4.2: The working group shall: (b) include stakeholders with expertise relevant to the subject matter of the standard, those that affected by the standard, and those that can influence implementation of the standard. The affected stakeholders shall be represented in an appropriate proportion among participants.	VL004 / 4.2.3. Appointment of working groups	PEFC Switzerland did not achieve the balanced representation of expertise and effected stakeholders from all stakeholder categories in the working group. Forest owners were over-represented. ENGOs and trade unions were not directly represented in the working group, although PEFC Switzerland considered the former to have been represented through an environmental consultant also representing the stakeholder category science, and the latter to have been represented by a representative of the wood industry often consulting with trade unions. A certification body was on the group, but did not participate in the working group meeting. Government/authorities declined to participate. Therefore, the PEFC Benchmark requirement for balanced representation of expertise and affected stakeholders in the working group has not been met. Nonconformity with PEFC ST 1001:2017, 6.4.2b, Process	To obtain a balanced representation of stakeholders in the working group, the importance of their engagement shall be communicated to the affected stakeholders as well as regular stakeholders in order to allow them to prepare their positions and identify critical issues. Issues relevant to the respective stakeholders that were identified during the gap analysis shall be documented, discussed and the importance of the stakeholders' inputs for the revision process shall be emphasised based on the respective matter with at least one representative (key stakeholder) of each stakeholder group. The outputs shall be documented. It shall be reached out to them in a timely manner to allow for finding suitable working group meeting dates. The invitation to the working group shall include specific arguments such as thematic contributions, representation of their interest group and the importance of their contribution in terms of potential impact on the PEFC standards and the representation of their stakeholders within the process. If there is no interest in participation, it shall be asked why and the identified key issues as well as their relevance for a balanced stakeholder representation and set of PEFC standards shall be emphasised. If an issue affects a specific stakeholder group, a representative shall be present at the working group. The Mandatory Guideline VL 004 was adapted. (Chapter 4.2.3, footnote added) Document name: VL_004_Standard_revision_procedures_20220103.	4.2.3. Appointment of working groups** ** Balancing representation in the working group To obtain a balanced representation of stakeholders in the working group, the importance of their engagement shall be communicated to the affected stakeholders as well as regular stakeholders in order to allow them to prepare their positions and identify critical issues. Issues relevant to the respective stakeholders that were identified during the gap analysis shall be documented, discussed and the importance of the stakeholders' inputs for the revision process shall be emphasised based on the respective matter with at least one representative (key stakeholder) of each stakeholder group. The outputs shall be documented. It shall be reached out to them in a timely manner to allow for finding suitable working group meeting dates. The invitation to the working group shall include specific arguments such as thematic contributions, representation of their interest group and the importance of their contribution in terms of potential impact on the PEFC standards and the representation of their stakeholders within the process. If there is no interest in participation, it shall be asked why and the identified key issues as well as their relevance for a balanced stakeholder representation and set of PEFC standards shall be emphasised. If an issue affects a specific stakeholder group, a representative shall be present at the working group.
Addressing Non-conformities Raised in ND_003_Standards_for_forest_management					
4	PEFC ST 1003, 8.1.4b: The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: (...) entails a small proportion (no greater than 5 %) of forest type within the certified area;	ND003 / A.1 Checklist on laws / G 16: The conversion of forest to plantations or non-forest use is not permitted except in cases where a clear felling has been officially evaluated and authorized.	While the conversion of forest to non-forest land is strictly limited by the Swiss Forest Act, a size limitation for conversions of not greater than 5% of forest type within the certified area as required by the PEFC International Benchmark Standard is neither defined by legislation, nor by ND 003. Therefore, this PEFC benchmark requirement cannot be considered as met. Nonconformity with PEFC ST 1003:2018, 8.1.4b	The standard ND003 was adapted. (conversions-G16, footnote added) Document name: ND_003_Standards_for_forest_management_20220103	ND003 / A.1 Checklist on laws / G 16: The conversion of forest to plantations or non-forest use is not permitted except in cases where a clear felling has been officially evaluated and authorized. ⁴ ⁴ In case of an authorized conversion, it shall only entail a small proportion (no greater than 5 %) of forest type within the certified area. In the case of officially ordered conversions with more than 5% of the forest type, real replacements must be made in the same area with species appropriate to the location.
5	PEFC ST 1003, 9.3.1: The standard requires that an annual management review shall at least include (...)	ND003 / Part C / 3.7: Operational audits are carried out in a way and at a frequency appropriate to the extent and the intensity of management operations and on the complexity and sensitivity of the particular ecosystem. The audits are conducted regularly and in a transparent manner to ensure that periodic reviews of the results show possible changes.	While the requirements for internal operational auditing can be considered as requirements for a "management review, it is required that the internal audit/review is conducted only "regularly" and "at a frequency appropriate to the extent and the intensity of management operations and on the complexity and sensitivity of the particular ecosystem". As, however, the PEFC benchmark requires an "annual" review, not just a "regular" one, the PEFC benchmark is not fully met. Nonconformity with PEFC ST 1003:2018, 9.3.1	The standard ND003 was adapted. (Part C, 3.7) Document name: ND_003_Standards_for_forest_management_20220103	Part C: 3.7. Operational audits are carried out in a way and at a frequency appropriate to the extent and the intensity of management operations and on the complexity and sensitivity of the particular ecosystem. The audits are conducted <u>regularly/annually</u> and in a transparent manner to ensure that periodic reviews of the results show possible changes.