



Sustainable Green Ecosystem Council

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Chiyoda-ku, Tokyo, JAPAN
TEL:03-6273-3358, FAX:03-6273-3368
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April 13, 2022

Mr. Michael Berger
Acting Secretary General
PEFC Council
Route de Pré-Bois 20
Case Postale 1862
1215 Geneva 15, Switzerland

Maintaining the Endorsement of the Sustainable Green Ecosystem Council's Forest Certification System

Dear Michael,

In response to your letter as of January 31st, 2022, on maintaining endorsement of the SGEC certification system, I have the pleasure to inform you that SGEC/PEFC Japan has implemented corrective actions to meet the two conditions pointed out in your letter as shown below:

- 1. Condition 1:** SGEC/PEFC Japan shall display the future review dates on all system documentation.

Action taken: SGEC/PEFC Japan proposed to the Board of Directors Meeting held on March 29, 2022, to define “March 29, 2026” as the next review date of the revised SGEC standard documents, and the Board unanimously approved the proposal. (Evidence is shown in Attachment 1 “Excerpt of the agenda of the Board of Directors meeting on March 29, 2022” and Attachment 2 “Excerpt of the minutes of the Board of Directors meeting on March 29, 2022”)

SGEC standard documentation with the review date amended based on the Board's decision is shown in ANNEX.

- 2. Condition 2:** SGEC/PEFC Japan shall make publicly available the feedback synopsis related to the public consultation.

Action taken: The synopsis of comments from the public consultation and responses by SGEC PEFC Japan had been made public through the website of SGEC/PEFC Japan on February 23, 2021 (Evidence is shown in Attachment 3 “SGEC/PEFC Japan website to show the download link of the synopsis”). This was reported to the Board of Directors meeting held on March 29, as confirmation of the action taken in response to the conditions as shown in Attachment 1 and 2.



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The synopsis was included in the Development Report of SGEC Revised Standard Documents dated April 30th, 2021, and attached again in this letter as the Attachment 4.

I would appreciate very much for your cooperation with respect to the re-endorsement of SGEC standards in advance and please feel free to inform us anything insufficient to meet the conditions.

Yours sincerely

梶谷辰哉

Tatsuya Kajiya
Executive Director and Secretary General
SGEC/PEFC Japan

c.c. Ms. Marta Martínez Pardo
Mr. Hubert Inhaizer

Attachment 1

Excerpt of the agenda of the Board of Directors meeting on March 29, 2022

<English translation of the agenda>

Agenda 2

Amendment of SGEC standards and endorsement by PEFC

1. Process of amendment of SGEC standards and endorsement by PEFC

March 28, 2021	Final approval of the revised SGEC standards by the Councilors meeting and the Board of Directors meeting
April 6, 2021	Application for re-endorsement was sent to PEFC
May 10, 2021	Web consultation with CEO and the officer in charge of PEFC International
May 31, 2021	Webinar to explain SGEC standard revision
June-July, 2021	PEFC public consultation
28 July, 2021	Contract with the consultant for assessment
June 1, 2021	Revised SGEC standard entered into force with the transition period until August 14, 2023.
June 29, 2021	The revision was reported in the General Assembly.
January 31, 2022	Letter from PEFC on maintaining endorsement
March 29, 2022	The Board of Director approval of actions taken to meet the conditions (scheduled)
April 2022	Report of actions taken to PEFC Council (scheduled)

2. The Letter from PEFC as of January 31st, 2022, on maintaining endorsement of the SGEC certification system

<omitted>

3. Actions taken to meet the conditions of maintaining endorsement.

The following actions to meet the conditions of maintaining endorsement will be reported to the PEFC Council upon approval by the Board of Directors.

(1) Condition 1: SGEC/PEFC Japan shall display the future review dates on all system

documentation.

Action taken: to add the supplementary article stating that “The next review shall be started on March 29th, 2026 or before” to the SGEC standard documents.

- (2) Condition 2: SGEC/PEFC Japan shall make publicly available the feedback synopsis related to the public consultation.

Action taken: The synopsis of the comments and responses on SGEC standard revision has been already publicly available on the website of SGEC/PEFC Japan since February 23rd, 2021.

Attachment 2

Excerpt of the minutes of the Board of Directors meeting on March 29, 2022

<English translation of the minutes>

**Minutes of the Second Meeting of the Board of Directors of SGEC/PEFC Japan
in FY 2022**

1. Date and Time: 14:00-15:40, March 29 (Tuesday), 2022
2. Venue: Meeting room, 4th Floor, Nagatacho-Building, 2-4-3 Nagata-cho, Chiyoda-ku, Tokyo Japan
3. Quorum: The required quorum is 10 attendants among 20 directors.
4. Number of attending directors: 16 including remote participation
5. Agenda
 - Agenda 1: FY2022 Activity Plan and Budget
 - Agenda 2: PEFC endorsement of the revised SGEC standards (actions to be taken)
 - Agenda 3: Date and agenda of FY2022 General Assembly
 - Agenda 4: others
6. Minutes of the meeting
 - (1) Confirmation of a quorum
<omitted>
 - (2) Discussion of agendas
 - Agenda 1 <omitted>

Agenda 2: PEFC endorsement of the revised SGEC standards (actions to be taken)

The chairman requested the secretariat to explain agenda 2 “PEFC endorsement of the revised SGEC standards (actions to be taken), and the secretariat explained the outline of the revised standards and proposed actions to be taken in response to the conditions for maintaining endorsement by PEFC. The chairman took vote on the agenda and the attendants unanimously approved the agenda as proposed.

<the rest is omitted>

Signed by

Mr. Satohiko Sasaki, Chairman of the Board of Directors of SGEC/PEFC Japan

Mr. Hiroshi Hagiwara, Auditor of SGEC/PEFC Japan

Mr. Daisuke Yoshino, Auditor of SGEC/PEFC Japan

Attachment 3

SGEC/PEFC Japan website to show the download link of the synopsis

ホーム ニュースレターと動画 パンフレット サイトマップ お問い合わせ English PEFC本部 検索



国際森林認証制度

SGEC/PEFCジャパン



一般社団法人 緑の循環認証会議・日本PEFC認証管理団体
Sustainable Green Ecosystem Council / PEFC National Governing Body in Japan

日本と世界の森を守る、マークです

森林認証制度とは	SGEC/PEFCジャパンとは	PEFCとは	国内認証取得状況・公示	商標使用について	認証規格文書	公示認定認証機関
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SGEC規格文書

SGEC 文書番号	文書名
定款 (SGEC文書1)	一般社団法人緑の循環認証会議 定款
附属文書1-1	入会申込書様式 (第7条)

2020 Tokyo Olympic/Paralympic

2020年10月20日 (SGEC規格改正パブコメ (様式))

第2回規格委員会 (3月2日) 資料 (事務局説明用)

2021年2月23日 規格改正パブコメ主要意見への回答	規格改正パブコメ主要意見への回答(Word版)
2021年2月17日 規格改正パブコメ主要意見への回答	規格改正パブコメ主要意見への回答(PPT版)
2021年2月22日 規格改正新旧対照表 (パブコメ赤訂)	規格改正新旧対照表 (パブコメ主要意見反映赤訂) (PDF)
2021年2月22日 規格改正新旧対照表 (パブコメ赤訂)	規格改正新旧対照表 (パブコメ主要意見反映赤訂) (Word版)
注: 質問、意見提出様式は、上欄のパブコメ用 (照会用) 原稿と質問・修正意見様式1, 2を流用。	
2020年度第2回評議委員会・理事会 (3月30日) 資料 (事務局説明用)	

February 23, 2021: Feedback to the opinions sent to the public consultation of the revised standards (Word version)

Attachment 4

Synopsis of responses to comments sent to the Public Consultation

Standard	Comments	Response
Standard Document 1		
3.3.1	FM certificate holders should be able to sell certified logs. In this case, the text of the standard should stipulate that sales of logs are done based on COC standard.	Add clause 3.3.3 to incorporate this comment to the standard
3.4.2	If a certificate is handed over from a CB to another CB, is the procedure for initial certification audit necessary?	Handing over of a certification in the middle of 5 year certification period is not preferable and in case of such handing over, the process of initial certification audit is needed. However, the text explaining that when necessary information is provided from the previous CB, then initial certification audit is not necessary is added.
7.2	CBs should publicize reports showing audit results, and SGEC/PEFC Japan should publicize their compiled report as a summary report on its website.	SGEC/PEFC Japan receives reports from CBs according to Appendix 3-1, 3-2, 3-3 of Standard Document 1, and makes them available upon requests. Making these report public on the website will be considered further, from the view pint of financial situation, etc.

Standard	Comments	Response
Standard Document 3		
2. International conventions, etc.	International Covenants on Human Rights (International Covenant on Economic, Social and Cultural Rights/ International Covenant on Civil and Political Rights) , Convention on the Elimination of all Forms of Discrimination against Women, Convention on the Rights of the Child, Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, Convention on the Rights of Persons with Disabilities, Convention for the Protection of All Persons from Enforced Disappearance, and Guiding Principles on Business and Human Rights should be added.	Considering importance of human rights for forest certification, these conventions are included.
3.8	Definition of “conversion of forest land use” should be deleted because definition of the term is different from meaning used in Japan.	<p>“Forest conversion” is defined in PEFC COC Standard as conversion of forests into non-forest land or forest plantation. Considering that forest plantation is not applicable in Japan, SGEC standard use different wording of “conversion of forest land use” considering general wording which means conversion of forest to different land use.</p> <p>In order to avoid misunderstanding, based on the note of PEFC standard, the following text is inserted:</p> <p>“Regeneration by planting or direct seeding and/or human-induced</p>

<p>4.1 e), f)</p> <p>e)</p> <p>SGEC Guide Document 3-1</p> <p>General opinion</p> <p>Specific opinion 3. Process of FPIC</p>	<p>Revised PEFC standard makes it possible to accept material with the claim of FM certificate holders of the system endorsed by PEFC as PEFC certified material. Therefore it does not need to define the claim of “100% SGEC/PEFC certified” and “100% SGEC certified” is enough.</p> <p>It should be made clear that COC certificate holders are not excluded.</p> <p>This guide document is problematic in standard setting process and defective in its content, therefore, therefore, the process and content should be changed so as to fulfil criteria 3-1 to 3-6 of FSC principle 3.</p> <p>(1) Consent should be obtained regarding the process and</p>	<p>promotion of natural seed sources (e.g. scarification) of the same dominant species which existed before harvesting or other species which had existed historically; or introduction of tree species according to national forestry policies is not considered ‘conversion of forest land use’”.</p> <p>Taking account of the comment, “SGEC/PEFC” claim is not defined.</p> <p>The text is changed so that it is made clear that COC certificate holders are not excluded.</p> <p>In the process of formulating this guide document, several times of consultation with Ainu Association of Hokkaido were held upon request from the association, and representatives from the association participated discussion and approval of the expert meeting (currently re-organized into the standard management committee).</p> <p>Moreover, in October 2020, upon request from Ainu Policy Promotion Division of Biratori Town Government, designated local government based on Ainu Policy Promotion Act, SGEC/PEFC Japan held a meeting with local organizations related</p>
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<p>Appendix 2</p>	<p>method to get consent, and participatory impact assessment should be carried out.</p> <p>(2) Firstly, initiation of consultation should be offered and its consent should be obtained. Consent should be also gained for the consultation, the process and method of acquiring consent.</p> <p>(3) Indigenous people are rights holders, so that they should be categorized as not stakeholders, but rights holders. “A sufficient period of time” should be confirmed and agreed by rights holders through consultation.</p> <p>(4) When there is no opinion or request, the start of consultation should be proposed. If no consent is gained for the start of the consultation is not agreed, then it should be judged that the consent is not obtained.</p> <p>Consent of the measures, impact assessment and “land rights as indigenous people” should be added.</p>	<p>to Ainu people such as Biratori Ainu Association and Nibutani handicraft cooperative, and explained them about the revision of SGEC standard and this guide. SGEC/PEFC Japan consider the process of formulation and the content of the guide is relevant because there were no opposition in that occasion.</p> <p>Moreover, the guide stipulates regarding concrete process of FPIC that “content and implementation order of the steps are not fixed, but flexibly changeable depending on consultation with Ainu people and their organizations”, and if serious problems arise during the course of implementation, these problems are to be handled in a adequate and timely manner accordingly.</p> <p>This appendix defines important elements for audits by certification body regarding compliance with the standard documents. This appendix was formulated by fulfilling the required process as in the case of the guide document, therefore the original text is maintained.</p> <p>It should be noted that, with respect to the rights, the standard document 3 stipulates as follows:</p> <p>“6.3.2.1 Property rights, tree ownership and land tenure arrangements shall be clearly defined, documented and established for the relevant management unit. Likewise, legal, customary and traditional rights related to the forest land</p>
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		shall be clarified, recognized and respected.”
Standard Document 3-1	<p>In case that consultation can not be started or concluded, it should be judged that FPIC is not obtained.</p> <p>Internal monitoring does not necessary, and internal audits only are sufficient.</p>	<p>This appendix was formulated by fulfilling the required process as in the case of the guide document, therefore the original text is maintained.</p> <p>It should be noted that These procedures are under continuous review based on the actual situation of certification audits and opinions of stakeholders.</p> <p>Internal monitoring was added by the revision of PEFC standard, so that SGEC standard should include it for re-endorsement by PEFC.</p>
Standard Document 4 General	<p>The term “products” should be “material/products”</p>	<p>According to the PEFC standard, different wording in Japanese was given for “input, input material”, “output”, “material”, “product” and “material/product”.</p>
3.15	<p>Man made forests should be categorized as “forest plantation”.</p>	<p>The term “plantation” was introduced to the PEFC standard in the latest revision. It mainly refers to large scale industrial plantation of exotic species, and such situation does not fit into man-made forests in Japan, and general criteria of forest management is sufficient for man-made forests in Japan.</p>
3.27	<p>If the on product claim of “controlled sources” is not allowed, the text “or directly on products”, which is not in the PEFC standard, should be deleted.</p>	<p>As note of 3.28 of Standard Document 4 says, “SGEC controlled sources” is the claim for materials and can not be used on products. To make this point clear, the text of 8.27 is changed as follows: “Organization’s declaration on</p>

6.4.9		material/products, stated in sales and delivery documentation, namely the claims “x% SGEC certified” and “SGEC controlled sources”.
Standard Document 5-1	The scope should be expanded from not just “wooden houses” but to “wooden construction”	Opinion is taken up and the word “wooden houses” is changed to “wooden construction”
Standard Document 6-1	Qualified auditors who completed SGEC training should be able to deliver training to other members of CBs.	For SGEC FM, the text is changed so that delivery of training by qualified auditors to other members of CBs is made possible.
4.2	Guide document 4-2 stipulates that trademark license of project certification can be applied in the planning stage. However there is no corresponding text in the standard document.	Based on the opinion, the text “or a specific SGEC project in a planning stage recognized by certification bodies” is added to 4.2 of the standard document 6-1.
Guide Document 8		
2	It may be problematic that auditors of SGEC/PEFC Japan become responsible persons to handle complaints, in light of SGEC Statute.	One of the roles of auditors of SGEC/PEFC Japan is to “request a report on activities from Directors or employees or review the status of operations and finances of the SGEC at any time” as defined in the Statute. Therefore it is appropriate for auditors as responsible persons to handle complaints on standard setting and management of the standards, which are the major task of SGEC/PEFC Japan. One the other hand, Secretary General, who administer standard setting and

		management of the standards as a main responsible person, is not an appropriate person to handle complaints.
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