



Assessment of the PEFC Certification Scheme Netherlands (PCSN) against the requirements of the PEFC Council

Final Report, 4 March 2022



Woodmotion

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Abbreviations

BoD	Board of Directors
CoC	Chain of Custody
EA	European Cooperation for Accreditation
FMP	Forest management plan
FMU	Forest management level
IAF	International Accreditation Forum
ISO	International Standardisation Organisation
NTFPs	Non-Timber Forest Products
PCSN	PEFC Certification Scheme Netherlands
PEFC	Programme for the Endorsement of Forest Certification
SFM	Sustainable forest management
ToF	Trees outside Forests

1 Background

PEFC Netherlands (here-in-after “the applicant”) has submitted its forest certification scheme (here-in-after “the scheme”) (see chapter 6) for mutual recognition and endorsement by the PEFC Council.

Following the PEFC Council’s procedures identified in PEFC GD 1007:2017, the PEFC Council selected TJConsulting to carry out an independent and impartial assessment of the scheme documentation against the PEFC Council requirements.

2 Objective

The objective of this assessment is to:

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

3 Impartiality claim

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

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

4 Recommendation

Following the evaluation of the “PEFC Scheme Netherlands” (PCSN) against the PEFC Council’s requirements, TJConsulting **recommends to the PEFC Council Board of Directors:**

- a) **to note a minor non-conformity** (No. 3) with the PEFC Council’s requirements relating to the standard-process without the need of any corrective action¹;
- b) **to request PEFC Netherlands to resolve 9 non-conformities** with the PEFC Council requirements; for standard setting procedures (No. 1), standard setting process (No. 2), group forest management / ToF certification (No. 4), and forest management / ToF standard (No. 5-10);
- c) **to request PEFC Netherlands to resolve editorial issues** indicated in Observations to the forest management standard (see page 22);
- d) **to request PEFC Netherlands to clarify the status of PEFC ST 2003:2020** within the PEFC Netherlands’ scheme²;
- e) **to recommend the scheme** for PEFC endorsement.

List of non-conformities		
1	Content of the Standards proposal for revision process (PEFC ST 1003:2017, 6.1.2)	Standard setting procedures
2	Public availability of standard setting procedures (PEFC ST 1001:2017, 5.1.2)	Standard setting process
3	Duration of public consultation (PEFC ST 1001:2017, 6.1.2e)	Standard setting process
4	A participant to provide information on non-conformities from other certifications (PEFC ST 1001:2017, 5.1.2e)	Group forest certification
5	Effective communication and consultation (PEFC ST 1003:2018, 7.3.1)	Forest management standard / ToF
6	Forest conversion (PEFC ST 1003:2018, 8.1.4)	Forest management standard / ToF
7	Disposal of waste (PEFC ST 1003:2018, 8.2.5)	Forest management standard / ToF
8	WHO 1A and 1B pesticides (PEFC ST 1003:2018, 8.2.8)	Forest management standard / ToF
9	Usage of introduced species (PEFC ST 1003:2018, 8.4.5)	ToF requirements
10	Categorisation of ToFs (PEFC ST 1003:2018, Appendix 2/E)	ToF requirements

¹ TJConsulting does not recommend to resolve the minor non-conformity relating to the standard setting process (the public consultation period) as this would require the applicant to repeat a significant part of the standard setting process. Therefore, the minor non-conformity should be taken into consideration and resolved during the next regular revision of the scheme.

² PEFC Netherlands adopted PEFC ST 2002:2020 (the PEFC CoC standard) as a part of PEFC Netherlands documentation (PCSN III). However, the use of PEFC ST 2003:2020 (Requirements for CoC certification bodies) is explicitly required through the PEFC notification contracts with certification bodies. This solution chosen by PEFC Netherlands fully meets the PEFC Council requirements and their objective. The fact that PEFC Netherlands has not formally adopted PEFC ST 2003:2020 as a part of the PEFC documentation should be considered as inconsistency in the PEFC Netherlands documentation rather than non-conformity with the PEFC Council requirements. Following the PEFC Council request, the issue was added to the Recommendation chapter.

5 Executive Summary

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

5.1 Standard setting procedures

The standard setting and revision process conducted by PEFC Netherlands is primarily governed by PCSN V (*Standard Setting Procedures*). Dispute settlement for the standard setting and also for other activities of the applicant is governed by PCSN VIII (*Complaints Procedure*) and PCSN VII (*College of Appeal Procedures*).

The scheme's standard setting procedures are logically structured and are mainly based on PEFC ST 1001:2017. They provide procedural basis for multi-stakeholder, open, transparent and consensus driven process. The procedures **comply with** PEFC ST 1001:2017, except one minor non-conformity:

- (1) **Content of the Standards proposal** for revision process (PEFC ST 1003:2017, 6.1.2) caused by incorrect reference.

Details about the assessment and the scheme compliance can be found in chapter 8.2.1 and Annex A of this report.

5.2 Standard setting process

The scope of this assessment is focused on the standard setting / revision activities carried out during the period between May 2019 (process announcement) and November 2020 (publication of the forest management / ToF standard).

The standard setting / revision process was led by a 15 members Forum with representation of key stakeholder groups, including forest owners and forest managers (3); chain of custody representatives from harvest to consumer (1); non-timber users of the forest (2); NGOs (2); employer and employee organizations (2); science (1); certification bodies (2); trees outside forest (2).

The members of the Forum had significant forestry and environmental based knowledge and practical experience in forest management and management of ToF.

Following the internal discussions within the Forum, a public consultation and a pilot testing, the Forum reached consensus by unanimous voting. The standard was then formally approved by the General Assembly of the applicant and published at its website.

The standard setting process **complies with** the PEFC requirements (PEFC ST 1001:2017), except the following minor non-conformities:

- (2) **Public availability of standard setting procedures** (PEFC ST 1001:2017, 5.1.2)
 (3) **Duration of public consultation – 60 days** (PEFC ST 1001:2017, 6.1.2e)

Details about the assessment and the scheme's compliance can be found in chapter 8.2.2, 8.2.3 and Annex A of this report.

5.3 Group forest management / ToF certification

The scheme allows group certification as a certification model that is suitable to the small forest owners that is typical for the country. The requirements for group certification are defined in PCSN II (*PEFC Group Certification – Requirements*).

The scheme documentation for the group certification follows the structure of ISO HLS (High Level Standard for management system) and PEFC ST 1002:2018 and **complies** with the PEFC requirements (PEFC ST 1002:2018) except the following minor non-conformity:

(4) A participant to provide information on non-conformities from other certifications (PEFC ST 1001:2017, 5.1.2e)

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

5.4 Sustainable forest management standard

The requirements for the sustainable forest management are defined in PCSN I (*Netherlands PEFC Standard*).

The document is structured similarly to the ISO High Level Standard structure for management systems and thus also largely consistent with the structure of PEFC ST 1003:2018.

The general management system requirements are largely identical with PEFC ST 1003:2018.

Concerning the specific performance-based requirements for sustainable forest management (chapter 8 Operation), the standard is based on six (6) criteria originating from the Pan European Operational Level Guidelines. For each of the criterion the standard defines specific requirements that are clear, auditable and unambiguous.

PCSN I **complies** with the requirements of PEFC ST 1003:2018, except the following minor non-conformities:

(5) Effective communication and consultation (PEFC ST 1003:2018, 7.3.1)

(6) Forest conversion (PEFC ST 1003:2018, 8.1.4)

(7) Disposal of waste (PEFC ST 1003:2018, 8.2.5)

(8) WHO 1A and 1B pesticides (PEFC ST 1003:2018, 8.2.8)

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

5.5 Requirements for Trees outside Forests (ToF)

The requirements for the ToF are defined in PCSN I (*Netherlands PEFC Standard*) in the core part of the document that is common for both the SFM and ToF certification, with an Appendix that alters specific requirements of the core part for the purposes of the ToF certification.

PEFC Netherlands has chosen the same approach as applied by PEFC ST 1003:2018 that is based on the following principles:

- a) Requirements in PCSN I, core part are also applicable to the TOF certification,
- b) Any modifications, alterations, interpretations or additional requirements are defined in Appendix 2 to PCSN I.

PCSN I **complies** with the requirements for ToF (PEFC ST 1003:2018, including Appendix 2), except the following minor non-conformities:

- (9) **Usage of introduced species** (PEFC ST 1003:2018, 8.4.5)
- (10) **Categorisation of ToFs** (PEFC ST 1003:2018, Appendix 2/E)

In addition, the minor non-conformities identified for the sustainable forest management standard (No. 5-8, see chapter 5.4) also apply to the ToF.

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

5.6 Chain of custody requirements

The applicant has formally adopted the PEFC international standard for chain of custody (PEFC ST 2002:2020) directly by approving the standard as a part of the scheme (*PCSN III*) and indirectly through mandatory references in the notification contract between PEFC Netherlands and certification bodies; and as such **complies** with the PEFC requirements.

Details about the assessment and the scheme compliance can be found in chapter 8.6 of this report.

5.6 Requirements for chain of custody certification bodies

The applicant has indirectly adopted the PEFC International requirements for chain of custody certification bodies (PEFC ST 2003:2020) through mandatory references in the notification contract between PEFC Netherlands and certification bodies, as such **complies** with the PEFC requirements.

Details about the assessment and the scheme compliance can be found in chapter 8.7.1 of this report.

5.7 Requirements for forest management / ToF certification bodies

The requirements for certification bodies for forest management certification are described in PCSN IV (*Procedures of Certification*). The document largely follows structure of ISO/IEC 17021-1 and includes additional requirements, especially those for competencies of auditors and for certification process. The document requires the certification bodies to hold valid accreditation from an IAF member and to conduct the forest management certification as accredited certification.

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

Details about the assessment and the scheme compliance can be found in chapter 8.7.2 and Annex E of this report.

6 Referenced documentation

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

PEFC Council requirements:

PEFC ST 1001:2017: Standard setting - Requirements

PEFC ST 1002:2018: Group forest management certification – Requirements

PEFC ST 1003:2018: Sustainable forest management – Requirements

PEFC ST 2001:2020: PEFC Logo Usage Rules - Requirements

PEFC ST 2002:2020: Chain of custody of forest based products – Requirements

PEFC ST 2003:2020: Requirements for certification bodies operating chain of custody certification against the PEFC Council international chain of custody standard

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

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

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

The scheme's documentation

The assessment of the scheme was based on the following documentation provided by the PEFC Council on 14 May 2021 and additional information provided by the applicant during the assessment process.

Submitted scheme documentation

Standards (PCSN)

	System description - PEFC Certification System Netherlands
PCSN I	Netherlands PEFC Standard (Jan 2022)
PCSN II	PEFC Group Certification – Requirements (Oct 2021)
PCSN III	Chain of Custody of Forest and Tree Based Products - Requirements
PCSN IV	Procedures of Certification (Oct 2021)
PCSN V	Standard setting procedures (Oct 2021)
PCSN VI	PEFC Trademark Rules - Requirements
PCSN VII	College of Appeal Procedures
PCSN VIII	Complaints procedure
PCSN IX	Guidance document

Other supporting scheme documentation:

Development report

Notification contract of CoC certification bodies

Notification contract for forest management certification bodies

PEFC Checklists

GAP Analysis

Dutch Forum

Records on the standard setting process referenced in the assessment

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

- [1] Minutes of the Forum meeting (24 September 2019)
- [2] Minutes of the Forum meeting (29 October 2019)
- [3] Minutes of the Forum meeting (20 November 2019)
- [4] Minutes of the Forum meeting (17 December 2019)
- [5] Minutes of the Forum meeting (21 January 2020)
- [6] Minutes of the Forum meeting (20 February 2020)
- [7] Minutes of the Forum meeting (9 October 2020)
- [8] PEFC Netherlands response to the assessor's request for information (August 2021)
- [9] Invitation to a Forum's postal ballot (19/10/2020)
- [10] GAP Analysis of PCSN I with PEFC ST 1003:2018
- [11] Development report
- [12] Standard revision proposal
- [13] [Announcement of the start of the revision process, PEFC Netherlands website \(20/5/2019\)](#)
- [14] Comments of the Dutch accreditation body (RvA) on the PCSN scheme (e-mail communication)
- [15] Minutes of the PEFC Netherlands Board meeting (19/6/2019)
- [16] Invitation to the Forum's meeting 24 September 2019, e-mail (13/9/2019)
- [17] E-mail, minutes of the Forum's meeting 24 September 2019
- [18] Invitation to the Forum's meeting 29 October 2019, e-mail (18/9/2019, 21/9/2019)
- [19] Invitation to the Forum's meeting 20 November 2019, e-mail (18/11/2019)
- [20] Invitation to the Forum's meeting 17 December 2019, e-mail (6/12/2019)
- [21] Invitation to the Forum's meeting 21 January 2020, e-mail (15/1/2020)
- [22] Invitation to the Forum's meeting 20 February 2020, e-mail (2/2/2020)
- [23] Invitation to the Forum's meeting 9 October 2020, e-mail (18/9/2020, 21/09/2020)
- [24] [Announcement of the public consultation on the PEFC Netherlands website \(12/3/2020\)](#)
- [25] [Announcement of the public consultation on the PEFC Netherlands Twitter \(25/3/2020\)](#)
- [26] [Announcement of the public consultation on forest owners association's website \(16 March 2020\)](#)
- [27] [PEFC Netherlands website dedicated to collection of comments from public consultation](#)
- [28] [PEFC Netherlands website dedicated to the standard setting / revision process.](#)
- [29] Pilot testing report, part 1 – ToF standard

- [30] Pilot testing report, part 2 – PCSN I – new criteria
- [31] [Announcement of the formal approval of the revised PCSN scheme \(26/11/2020\)](#)
- [32] Stakeholders mapping exercise
- [33] Stakeholders mapping table (Excel file)
- [34] Letter – announcement of the start of the process/invitation to the Forum (22 May 2019)
- [35] E-mail with announcement of the start of the process/invitation to the Forum (22 May 2019)
- [36] E-mail with invitation to the public consultation
- [37] [Video at the PEFC Netherlands' Youtube channel introducing the revision process and public consultation](#) (7 April 2020)
- [38] Response with results of consideration of comments to the Wageningen University (9 October 2020)

7 Methodology and timetable

7.1 Scope of the assessment

The assessment was carried out based on PEFC GD 1007:2017, the tender dossier of 14 May 2021 and the TJConsulting's tender proposal of 4 June 2021.

The assessment that resulted in the report was carried out as a desk-top exercise based on the documentation that was provided by the applicant (see chapter 6). The standard setting process as well as non-conformities identified in a draft interim report were verified during online stakeholders interviews.

7.2 Assessment process

Table 1 describes the assessment process that is based on and fully conforms to PEFC GD 1007, the tender dossier of 14 May 2021 and the tender proposal of 4 June 2021.

Table 1: Stages of the assessment process

Stage	Description	Output	Time / Period
Start of the assessment	The start of the assessment was announced by the PEFC Council. TJConsulting provided the PEFC Council and the applicant with the specific dates/deadlines of the assessment in compliance with this proposal.	The start announcement	2 August 2021
Stage 1 assessment	In the beginning of the assessment, TJConsulting made a request for the referenced records and additional documentation that is necessary for the assessment of the scheme against the PEFC requirements, including translation needs. Stage 1 assessment also included distribution of the stakeholders' questionnaire and its analysis.	Interim report	2 Aug 2021 – 13 Sep 2021
Comment period	The PEFC Council and the applicant were provided with the interim draft report with possibilities to submit comments, responses, clarifications or changes to the scheme documentation.	The applicant's response to the interim report	15 Sep – 22 Oct 2021
In-country visit	In-country visit and interview of the applicant's staff / key persons/stakeholders	A report on the in-country visit	27-29 Sep 2021
Stage 2 assessment	Stage 2 covered consideration of the applicant's responses as well as	Final draft report	22 Oct 2021 – 12 Nov 2021

Stage	Description	Output	Time / Period
	comments received from the PEFC international public consultation		
Stakeholders consultation	TJConsulting analysed stakeholders' comments resulting from direct invitation of Dutch stakeholders	Final draft report	11 Nov 2021
PEFC Council's internal review	The Final draft report reviewed by the PEFC Council. The PEFC Council will provide TJConsulting with its comments.	Comments from the PEFC Council	12 Nov – 16 Nov 2021
Interruption of the assessment process	Following the draft interim report, the PEFC Council requested the applicant to revise PCSN I concerning the ToF	Revised PCSN I	16 Nov 2021 – 8 Feb 2022
Consideration of the PEFC Council's comments	TJConsulting considered and provided responses to individual comments and will amend the report where applicable.	Final report (including an appendix on the internal review)	8 Feb 2022 – 15 Feb 2022 28 Feb 2022 – 4

7.3 Classification of non-conformities

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

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

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

8 Assessment

8.1 General analysis of the structure of the scheme

The scheme documentation

The scheme documentation includes 9 numbered documents (PCSN I – PCSN IX) and one unnumbered document (*System description*).

The documents' scope is clearly defined based on key process of the certification scheme (see the tables below)

Standards (PCSN)

	System description - PEFC Certification System Netherlands
PCSN I	Netherlands PEFC Standard (Jan 2022)
PCSN II	PEFC Group Certification – Requirements (Oct 2021)
PCSN III	Chain of Custody of Forest and Tree Based Products - Requirements
PCSN IV	Procedures of Certification (Oct 2021)
PCSN V	Standard setting procedures (Oct 2021)
PCSN VI	PEFC Trademark Rules - Requirements
PCSN VII	College of Appeal Procedures
PCSN VIII	Complaints procedure
PCSN IX	Guidance document

Process	Scheme documentation	
Standard setting	PCSN V	PCSN VIII, PCSN VII
Forest management / ToF	PCSN I	PCSN IX
Group forest certification	PCSN II	PCSN IX
Chain of custody	PCSN III	
PEFC Trademark usage	PCSN VI	
Certification and accreditation	PCSN IV	PEFC ST 2003

Observations

It is not clear why PEFC Netherlands adopted the PEFC International Chain of Custody standard as a part of its scheme with a scheme specific identification (PCSN III). However, the same approach has not been used for the PEFC Council's international requirements for CoC certification bodies (PEFC ST 2003:2020). This document is "only" referenced by the PEFC Netherlands notification contract.

All documents include identification of the approval and application date. PEFC Netherlands decided to amend some of the documents (see chapter 6) in October 2021 as a response to non-conformities identified by a draft interim report of this assessment. However, this step has not been taken into account in the approval / publication dates.

Organisational arrangement

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

PEFC Netherlands	<p>The Standard setting body/the scheme owner</p> <ul style="list-style-type: none"> - Develops and manages the scheme; - Notifies (formally recognises) the certification bodies; - Issues the PEFC Logo licenses in the Netherlands. <p>For the purposes of the development of the forest management / ToF standard and other part of the scheme documentation, PEFC Netherlands forms a Forum.</p> <p>For the appeals, PEFC Netherlands refers to an independent College of Appeals (PCSN VII).</p>
Certification body	<p>Certification bodies are responsible for auditing forest management and chain of custody and issuance of certificates.</p> <p>The certification body is an independent third party that shall be accredited by an accreditation body that is a member of the EA/IAF.</p>
Accreditation body	<p>The accreditation body evaluates competencies and impartiality of the involved certification bodies and makes surveillance of their activities.</p> <p>PEFC Netherlands requires the accreditation body to be a member of the EA/IAF.</p>
Forest (ToF) owner / management company / group of forest owners	<p>Forest (ToF) owners / managers are responsible to implement the forest management standard and to comply with it.</p> <p>They are clients to the certification body and recipients of the forest management certificate.</p>
Processing / trading companies	<p>The companies are responsible to implement the chain of custody standard (PCSN III/PEFC ST 2002:2020) and comply with it.</p> <p>They are clients to the certification body and recipients of the chain of custody certificate.</p>

8.2 Assessment of requirements for standard setting

8.2.1 Assessment of the standard setting procedures

The standard setting and revision process governed by PEFC Netherlands is primarily regulated by PCSN V (Standard setting procedures).

Dispute settlement for the standard setting and also for other activities of PEFC Netherlands is defined in PCSN VIII (Complaints procedures) and PCSN VII (College of appeal procedures).

PCSN V identifies PEFC Netherlands as the standardisation body with the National PEFC Forum Group as the body with balanced representation of stakeholders that is responsible for building consensus. PEFC Netherlands' General Assembly is defined as the body responsible for formal approval of standards.

A. Procedures for the standard setting process

The standard setting procedures document (PCSN V) is logically structured and follows the process approach defined in PEFC ST 1001:2017. It largely uses its structure and sometimes also wording of the PEFC international document. PCSN V includes procedural requirements for:

- Identification of stakeholders, their constraints and means of resolving them;
- Announcement of the standard setting in timely manner and in suitable media, providing information about the planned process and inviting stakeholders to submit their nominations to the Forum;
- Establishment of the Forum;
- Development of the standard by the Forum;
- Two months' public consultation announced in suitable media, consideration of stakeholders comments and making summary of the comments and their consideration publicly available;
- Second, one-month public consultation for new standards;
- Pilot testing;
- Decision making of the Forum and building consensus;
- Formal approval of the standard by the PEFC Netherlands' General Assembly and its publication;
- Maintenance of the standard, including its review and revision.

Forum for the development / revision of the standard

PCSN requires that the Forum is established by the PEFC Netherlands Board based on nominations of stakeholders and requires balance of stakeholders within 7 predefined stakeholder groups:

- Forest owners and forest managers;
- Chain of custody from harvest to consumer;
- Non-timber users of the forest;
- NGOs - Employer and employee organizations;
- Science (research institutes and universities);

- Certification bodies;
- Trees outside forest.

PCSN V defines the quorum of the Forum voting to approve the standard with a majority vote in favor of four (out of eight – 50 %) stakeholder categories. Any sustained opposition (well-founded opposition) shall be resolved by means specified in PCSN V, 6.4.7.

Where the predefined actions (6.4.7) do not resolve the sustained opposition, the topic is submitted to the PEFC Netherlands' college of appeals (6.4.8, PCSN VII) whose outcomes are binding for the Forum. The college of appeals is an independent body outside of PEFC Netherlands.

Dispute settlement procedures

PCSN V makes reference to the PEFC Netherlands complaints procedures (PCSN VIII) that describe procedures for resolution of any complaint relating to PEFC Netherlands' activities, including standard setting. The appeals are dealt in accordance with the PEFC Netherlands appeal procedures (PCSN VII). Both, PCSN VIII and PFCS VII satisfy the PEFC requirements for dispute resolution in the standard setting.

Review and revision of the standards

PCSN V includes an identical approach towards the review and revision of the forest management standard. It requires a periodic, maximum five years, review of the forest management standard that includes a gap analysis as well as stakeholders' consultation.

Following the review, PCSN V defines three types of revisions, periodic revision, administrative revision and time-critical revision.

B. Results of the assessment of the standard setting procedures

PCSN V and supporting documentation relevant to the standard-setting **comply** with the PEFC requirements, except the one minor non-conformity:

PEFC requirement	6.1.2 Procedures: Standards proposal for revision process
No.	1
Type	Minor non-conformity
Description	<p>PCSN V requires in 6.1.2 that the Standard Proposal for revision shall only include limited elements.</p> <p>However, the reference is wrong as chapter 5.1.1 does not relate to the Standard Proposal. In addition, even if the reference is corrected to 6.1.1, bullet point e is non-existent even in chapter 6.1.1.</p>

Observations to the standard setting procedures (not causing non-conformity with the PEFC requirements)**Observation – References in the scheme documentation**

It should be noted that wrong references are included in a document called “System description” where PCSN VII is referenced as complaints procedures and PCSN VIII as appeal procedures. While the reality is that PCSN VIII includes complaints procedures and PCSN VII appeal procedures.

Observation – Stakeholder categories

The text of PCSN V implies that the stakeholders mapping and identification of stakeholder categories is explicitly linked to creation of the Forum. However, the objective of the stakeholder mapping as described in PEFC ST 1001:2017 is broader and relates to several stages of the standard setting, e.g. announcement of the start, setting of the Working Group, public consultation.

In addition, the added categories such as non-timber users or trees outside forests are difficult to define as other categories could also have interest in those categories (land owners, NGOs). Finally, the category of “employer and employee interest” is not clearly defined and forest owners/managers or business/industry will most likely have conflicting interests than representatives of employees and trade unions.

Observation – “review” vs “revision”

PCSN V makes an inconsistent use of the term review and revision. Following PEFC ST 1001:2017 and ISO Directive 2, the review process focuses on whether a standard continues to be fit for purpose while the revision process focuses on introducing changes into an existing standard.

PEFC Netherlands corrected uses the term review in chapter 8 but then uses inconsistently the term “review” in chapter 9 that focuses on revision.

8.2.2 Assessment of the standard setting process

Scope of the assessment

The scope of this assessment is focused on the standard setting activities carried out during the period between March 2019 (preparation phase) and November 2020 (publication of the forest management standard, PCSN I).

Following PEFC ST 1001:2017, the assessment is only focused on the development of the forest management standard, respectively ToF requirements (PCSN I). Development of other documentation and standards of the PCSN scheme is outside the scope of this assessment.

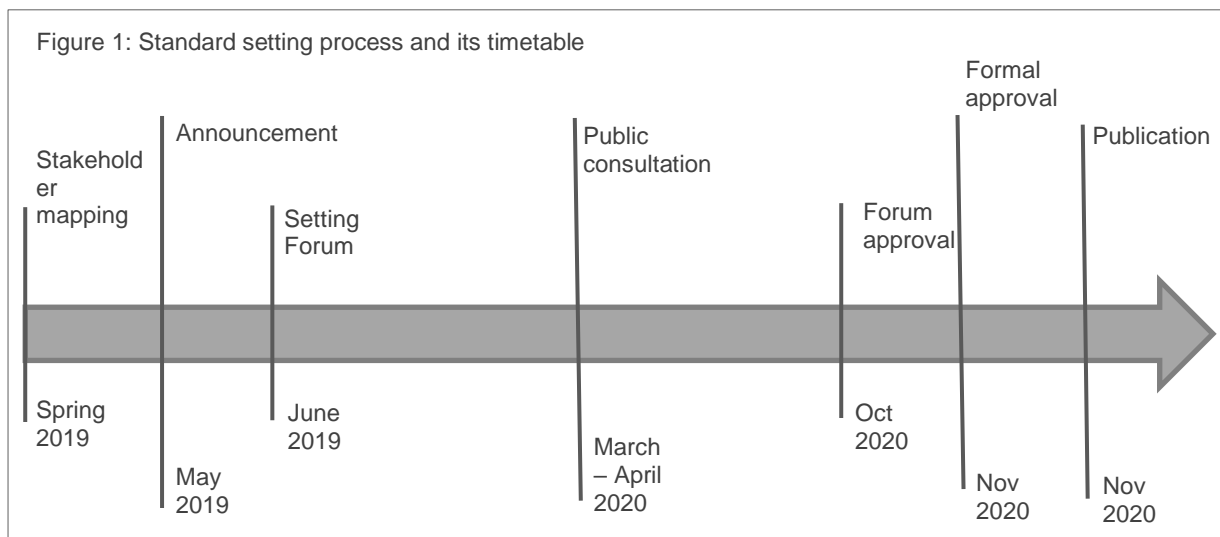
Standard setting process

The standard setting (revision) process formally started by development of a standard proposal and stakeholders mapping exercise that was carried out by PEFC Netherlands in Spring 2019.

This step was followed by the formal announcement of the process start that was presented at the PEFC Netherlands' website and Twitter on 20 May 2019. The announcement was also communicated by a letter/e-mail of 22 May 2019 that was sent to all stakeholders identified in the stakeholders mapping.

The process was completed by the formal approval of the forest management / ToF standard (PCSN I) on 5 November 2020 followed by its publication on 26 November 2020.

The stages of the process and its timetable is shown in figure 1:



Stakeholders mapping

PEFC Netherlands conducted stakeholders mapping in the beginning of the process that resulted in identification of stakeholder categories^[32] (including key issues, constraints for participation, means of communication) and a list of stakeholders^[33] that were classified according to the predefined seven (7) stakeholder categories.

The stakeholders mapping also identified “key stakeholders” (important stakeholders). No disadvantaged stakeholders had been identified as no stakeholders in the Netherlands were considered as disadvantaged based on resources, language or access to information.

Announcement of the standard setting process

PEFC Netherlands announced the start of the revision process by:

- A news at the PEFC Netherlands website (20/5/2019)^[13];
- Direct mailing (22 May 2021)^[34, 35].

The announcement was published at the PEFC Netherlands website four weeks prior to the first meeting (27 June 2019).

The content of the announcement, including references to the PEFC Netherlands website and attachments to the E-mail announcement^[35] included all elements that are required by PEFC ST 1001:2017.

Forum for the development revision of SFM / ToF standard (Forum)

The revision of the forest management standard and development of ToF requirements were led by the Forum. Based on call for nominations^[13, 34, 35], the PEFC Netherlands BoD established the Forum by accepting all received nominations^[15]. In addition the Board appointed a Chairman of the Forum. Following the nominations acceptance, two nominations have been withdrawn and one person did not respond to the confirmation.

The Forum consisted of 15 members (plus a Chairman) with balanced representation of pre-defined 7 stakeholder (See Annex E):

- Forest owners and forest managers (3);
- Chain of custody from harvest to consumer (1);
- Non-timber users of the forest (2);
- NGOs (2)
- Employer and employee organizations (2);
- Science (1);
- Certification bodies (2);
- Trees outside forest (2).

All members of the Forum have expertise and knowledge in their respective field.

The stakeholders that can influence the implementation and those that are affected by the implementation of the standard (forest owners, ToF, non-timber forest products, certification bodies, employees) are well represented (11 out of 15).

Those stakeholders that are affected by the standard (forest owners, ToF, employees) represent an appropriate proportion (7 out of 15). Affected stakeholders, mainly forest management organisations and workers representatives are well represented.

Name	Organisation	Stakeholder Category
Ronald van den Brink	Gemeente Amsterdam (municipalities)	Trees Outside Forest
Erik Bakker	Gemeente Zwolle (municipalities)	
Reinier Engbers	Landgoed Heksenweg (private forests)	Forest Owner
Gerard Koopmans	Bosgroepen (private forests)	
Harrie Hekhuis	Staatsbosbeheer (state forests)	
Evan Buytendijk	Ingenieursbureau IEB	Certification Body
Sander van Riel	SKH	
Bianca Poelman Kraak	Houthandel VIPO	CoC from harvest to consumer
Piet Bergers	Zoogdierenvereniging/SoortenNL (E-NGO)	NGO
Jan ten Hopen	SoortenNL (E-NGO)	
Laurens Hoedemaker	Koninklijke Nederlandse Jagers Vereniging (hunters)	Non-timber user of the forest
Fransjan de Waard	Stichting voedselbosbouw.nl (non-timber products)	
Jacqueline Kraan	CNV (trade unions)	Employer and employee organizations
Fred van Anrooy	FNV (NGO – workers rights)	
Marjanke Hoogstra	Wageningen University and Research	Science

Albert
Schimmelpenninck

Chair

Open and transparent work of WG

During the standard setting / revision process, the Forum met 8 times. After the introductory meeting held on 27 June 2019, the Forum met on (all in person meetings):

- 24 September 2019^[1],
- 29 October 2019^[2],
- 20 November 2020^[3],
- 17 December 2019^[4],
- 21 January 2020^[5],
- 20 February 2020^[6],

- 9 October 2020^[7].

Summary of the Forum's work:

- The Forum met 7 times during the period between September 2019 and October 2020.
- For all those meeting, the PEFC Netherlands' secretariat distributed a written invitation (e-mail)^[16-23] that included an agenda, draft standard or their parts, and other supporting documentation).
- The meetings were well organised with clearly written and communicated agenda for each meeting.
- The meetings were well attended by members of the Forum.
- The meetings provided sufficient time for discussion.
- The minutes of the meetings have been kept and distributed to the Working Group members as a part of the invitation to the next meeting^[17-23]. The agenda for each meeting also included approval of minutes from the last meeting^[1-7].

Public consultation

PEFC Netherlands organised one public consultation.

The announcement of the public consultation has been announced by the following means:

- a) at the PEFC Netherlands website on 12 March 2020^[24],
- b) at the PEFC Netherlands Twitter on 25 March 2020^[25],
- c) at the forest owners associations' website on 16 March 2020^[25],
- d) e-mail invitation sent to all stakeholders identified in the stakeholders mapping^[36].

In addition, an introduction to the revision process was also published at the PEFC Netherlands' Youtube channel^[37],

The public consultation lasted from 12 March until 26 April 2020^[24] (45 days) and was supported by a dedicated website allowing to read the draft standard and to make comments directly to a specific chapter of the standard^[27]. The 45 days public consultation does not meet the minimum 60 days period required by PEFC ST 1001:2017. However, it should be noted that the public consultation website^[27] remained open long after the formal public consultation period. In addition, the Forum also considered comments (from one stakeholder) that were received after the formal end of the consultation.

PEFC Netherlands planned to organise a seminar that was however cancelled due to coronavirus restrictions in 2020.

PEFC Netherlands claims that it had not received any comment during the public consultation period^[8]. The only comments were received after the formal consultation period, were considered by the Forum and outcome of this consideration was communicated to the stakeholder submitting the comments^[38].

Pilot testing

PEFC Netherlands commissioned a pilot testing for both the new criteria of the existing forest management standard^[30] as well as for the ToF requirements (standard)^[29].

It should be noted that PEFC ST 1001:2017 does not require pilot testing for the revision of an existing standard, when experience from its usage can substitute for pilot testing. Since the ToF requirements represents a new field of application with new requirements and there's no experience from its implementation, the pilot testing for the ToF is considered as relevant and mandatory part of the standard revision.

The pilot testing has been carried out on Landgoed Twickel estate that covers both forest land as well as agriculture land with tree cover (ToF). The pilot testing has been carried out by the certification body as a part of regular audit with the presence of PEFC Netherlands' staff.

The pilot testing resulted in two studies^[29,30], one relevant for the ToF^[30] and the second for new criteria of the forest management standard^[29].

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

The Forum unilaterally accepted the final wording of the Standard (PCSN I) at its meeting held on 9 October 2020^[7], except for three criteria that were decided to be sent out to members of the Forum for the postal ballot.

The conditions of the postal ballot^[9] (19/10/2020) indicated that no response to the postal ballot (23/10/2020) would mean acceptance of the standard. The postal ballot accepted the three remaining criteria.

Formal approval of the SFM standard and its publication

PCSN I was approved by the PEFC Netherlands General Assembly on 5 November 2020.

PEFC Netherlands published a news at its website on formal approval of the revised scheme (26 November 2020)^[31]. However, the announcement does not include a link to the newly approved standard(s).

The newly approved standards have been published at the website that has been dedicated to the revision of the scheme^[28].

Results of the assessment of the standard setting process

The standard setting process complies with the PEFC requirements except the following minor non-conformities.

PEFC requirement	5.1.2 Process: Public availability of the standard setting procedures
Non-conformity No.	2
Type	Minor non-conformity
Description	<p>PEFC Netherlands has published its standard setting procedures (PCSN V, version 2016 and 16/2/2021) at its website dedicated to the revision process (www.pefc.nl/forum).</p> <p>The expectation of the PEFC requirement is that the standard setting procedures document (as well as other parts of the scheme's documentation) are permanently accessible to stakeholders (not only during the standard setting process). Although the document (PCSN V) is publicly available, the access to this document is very complicated as a person searching for the document would need to know the structure of the PEFC Netherlands' website and go to the fourth level of the website (certification => forest certification => national PEFC Forum => a link to the document).</p> <p>In addition, the PCSN V document was amended as a part of the PEFC assessment process (October 2021) in order to respond to the non-conformities of a draft interim report. However, this version of the document (24/9/2021) is not available at the PEFC Netherlands website and it is not clear under which section of the website the document would be published.</p>

PEFC requirement	6.5.1e Process: announcement - public consultation 60 days period
Non-conformity No.	3
Type	Minor non-conformity
Description	<p>The public announcement of the public consultation at the applicant's website^[24] indicated that the public consultation lasted from 12 March 2020 until 26 April 2020 (45 days instead of 60 day required by PEFC ST 1001:2017).</p> <p>It should be noted that the public consultation website^[27] remained open after long after the official public consultation deadline.</p> <p>In addition, PEFC Netherlands received comments from a single stakeholder (Wageningen University) after the formal end of the public consultation. The comments were still accepted and considered by the Forum at its September meeting^[7].</p>

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

Observation – approval of amendments to the standard

PEFC Netherlands amended the standard (PCSN I) during the revision process. However, this event is not reflected in the issue/approval date displayed on the standard.

8.2.3 Stakeholders questionnaire and interviews

TJConsulting distributed an invitation to an on-line survey to Dutch stakeholders with a request to provide feedback on the standard setting/revision process of the scheme.

TJConsulting provided stakeholders with four (4) weeks response period between 2 September 2021 and 30 September 2021.

No responses had been received.

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

As a part of the in-country visit, the assessor interviewed key stakeholders with the following feedback to the revision process:

- a) The invitation to the Forum was done on personal basis by a direct contact;
- b) The Forum was balanced and included all relevant stakeholders;
- c) The Forum's members were supported by PEFC Netherlands, provided with good information and coordination service;
- d) The process included sufficient discussion and good / professional atmosphere;
- e) Consensus was reached, issues were resolved by discussion and voting was thus unanimous;
- f) Time for the process was sufficient;
- g) The standard was tested on one FMU for both the sustainable forest management as well as for the ToF.

The in-country visit report is shown in Annex I.

8.3 Requirements for group certification

8.3.1 Introduction

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

The requirements for the group certification are defined in PCSN II (*Group certification*).

The group certification model is based on a group of participants (owners/managers) that is managed and controlled by a “group manager”. Concerning the structure of the requirements for the group forest management certification, PCSN II uses the ISO High Level Standard structure (HLS) for management system that is also basis for PEFC ST 1002:2018.

8.3.2 Group certification model

The approach for a number of requirements of PCSN II concerning the group certification model is similar to PEFC ST 1002:2018.

The requirements for the **group entity** and its group management system contain:

- a) Context of the group organisation
- b) Leadership (including commitment and responsibilities)
- c) Planning
- d) Support (including stakeholders' identification, consultation and dispute settlement)
- e) Operation
- f) Performance evaluation (including monitoring, internal audits and management review)
- g) Improvement (including non-conformities management)

Internal monitoring programme

PCSN II defines an annual internal monitoring programme and defines key indicators that are evaluated by the group manager based on information provided by the group members.

Internal audit programme

Sample size: The size of the sample is defined as a square root of a number of participants ($y=\sqrt{x}$) that can be reduced by a factor of 0.6 based on results of the internal monitoring programme (only for one sample category).

Sample categories: A sample is calculated separately for two sampling categories, participants below and above 75 ha.

Selection of the participants to the sample

25 % of the sample shall be selected randomly, for the rest PCSN II defines risk criteria.

Results of the evaluation

The scheme's requirements for group certification (PCSN II) **comply** with the PEFC requirements (PEFC ST 1002:2018), except for the following minor non-conformity.

PEFC requirement	5.1.2e Information on non-conformities from other certifications
Non-conformity No.	4
Type	Minor non-conformity
Description	The document requires the participant to provide information on non-conformities in the previous certifications. However, this does not cover a situation where a forest/land owner would be covered at the same time by more PEFC certifications.

8.4 Forest management standard

8.4.1 Introduction and summary

Structure of the Standard

The requirements for the sustainable forest management are defined in PCSN I (*PEFC Netherlands Standard*).

The document's structure is based on the ISO High Level Standard structure for management systems and PEFC ST 1003:2018 with some modifications as chapter "Support" (HLS) has been integrated into chapter "Context" and "Leadership and communication" of PCSN I.

The Standard includes three "mandatory/normative" appendices:

- a) Appendix 1: Content of the management plan;
- b) Appendix 2: Trees outside forests;
- c) Appendix 3: Abbreviations.

The general management system requirements are largely identical with PEFC ST 1003:2018, the differences in language are mainly caused by translation from PEFC ST 1003:2018 (English) to Dutch and back to English.

Concerning the specific performance requirements for sustainable forest management (chapter 7 Operation), the standard is based on six (6) criteria originating from the Pan European Operational Level Guidelines. For each of the criterion, the standard defines individual requirements, in many cases further split by bullet points. The structure and wording of the requirements is clear, understandable and unambiguous.

Criterion		Number of requirements
1	Maintenance of capacity of the forest resources and their contribution to global carbon cycles.	4
2.	Maintaining the vitality, health and protective functions of forest ecosystems	5
3.	Maintenance and promoting productive functions of forests	5
4	Maintenance, protection and possible improvement of biological diversity in forest ecosystems	13
5.	Applicable international, national and local legislation and forest management	6
6	Maintenance of socio-economic conditions and functions of forests	7
Total number		40

Management cycle and continuous improvement

The standard includes detailed requirements for forest management planning, including a cycle of inventory and mapping of forest resources, planning of forest management activities, implementation of prescribed activities and monitoring.

Detailed and comprehensive a content of management plans is described in Appendix 1 to the Standard.

Compliance with legislation

The standard requires compliance with applicable legislation and defines the following areas of the legislation that are applicable to forest management:

- a. Forest management practices;
- b. nature and environmental protection;
- c. protected and endangered species;
- d. property, tenure and land-use rights for local communities or other affected stakeholders;
- e. health, labour and safety issues;
- f. anti-corruption;
- g. the payment of applicable royalties and taxes.
- h. other legal requirements.

The standard also requires to protect forests from illegal activities of third parties.

Trees outside Forests

The Standard allows certification of Trees outside Forests (ToF) and includes a dedicated Appendix for this subject. Following the approach of PEFC ST 1003:2018, the Standard does not define specific set of requirements for ToF but rather requires that the requirements of the core part of the document shall be used with modifications / interpretations that are defined in Appendix 2.

8.4.2 Assessment of the forest management standard

The forest management standard has been assessed against the PEFC Council requirements that are defined in PEFC ST 1003:2018. The following “summary” description of the compliance includes description of the scheme’s SFM standard requirements (PCSN I) in relation with key areas of sustainable forest management defined by PEFC ST 1003:2018.

The report includes the following parts relating to the assessment of the Standards’ compliance with PEFC ST 1003:2018:

- a) Summary description of the Standards’ compliance with PEFC ST 1003:2018 is described in chapter 8.4.2.1;
- b) Assessment results are included in chapter 8.4.2.2;
- c) Detailed assessment of individual PEFC requirements, including assessment conclusion and justifications are included in Annex C to this report.

8.4.2.1 Description of the Standards’ compliance with PEFC ST 1003:2018

General requirements for forest management standards (PEFC ST 1003:2018, 4.1, 4.3.1, 4.3.2)

The standard includes clear and auditable requirements for FMU level, both management system (planning, monitoring, etc.) as well as performance-based requirements with specific indicators for forest operations. The standard defines that it applies to all entities operating on defined area (7.6.4). It requires records keeping (6.2.2).

The Standard requires to identify boundaries and scope of the management system and refers to the continuous improvement cycle (4.3).

Usage of PEFC claims (PEFC ST 1003:2018, 4.1)

The standard states that forest owner/manager with PEFC-recognised certificate issued against the Standard shall use the PEFC claim “100% PEFC certified” only for products originating in the certified area (4.1).

The Standard requires to provide customers with information that is satisfying PEFC ST 2002:2020 (4.1).

Stakeholders’ identification (PEFC ST 1003:2018, 4.2)

The Standard requires to identify affected stakeholders, their needs and expectations (4.2).

Leadership / commitment (PEFC ST 1003:2018, 5)

The Standard requires publicly available commitment on compliance with the Standard and identification of responsibilities (5).

Planning (PEFC ST 1003:2018, 6)

The Standard requires to identify risk and opportunities (6.1.1); to conduct inventory and mapping of forest resources (6.2.1, Appendix 1), defines requirements for periodically updated forest management plan (6.2.1, Appendix 1) and its public availability (6.2.3).

Legal compliance (PEFC ST 1003:2018, 6.3.1), **legal customary and traditional rights** (6.3.2), **human rights** (6.3.2.3) and **fundamental ILO conventions** (6.3.3)

The Standard requires identification and access to applicable legislation, and compliance with it (6.3.1.1). The definition of the applicable legislation covers all areas specified by the PEFC requirement. This also includes protection of the forest from unauthorised activities of third parties (6.3.1.2).

The Standard includes a requirement for legal rights, property and forest use rights (6.3.1.1) that are in the Netherlands fully covered by the applicable legislation; and for human rights (6.3.2.2, 6.3.2.3, 6.3.1.1). The UN Universal Human Rights are guaranteed by the Netherlands legislation.

The Netherlands has ratified all eight fundamental ILO conventions and it can be assumed that those have been implemented through the national legislation. The national labour related legislation is referenced in PCSN I requirement 6.3.1.1.

Health, safety and working conditions (PEFC ST 1003:2018, 6.3.4)

PCSN I requires to adopt safety regulation and shall ensure usage of safety equipment (6.3.2.1) and makes a reference to the “Forests and Nature Health and Safety Manual^[40]” (“Arbocatalogus Bos en Natuur”, <https://www.stigas.nl/agroarbo/bos-en-natuur>).

The manual includes detailed health and safety measures as well as Checklists for each area, including evaluation of health and safety related risks.

The forest owner/manager shall use a collective working agreement (6.3.2.2). Contractors are required to comply with the health and safety Manual and the Working Conditions Act (7.6.4). The collective working agreement and the Working conditions act ensure that working hours and leave comply at least with national regulations.

The Standard includes a requirement for equal opportunities and non-discrimination and promotion of gender balance (6.3.2.3).

Resources, competence, communication, dispute settlement, documented information (PEFC ST 1003:2018, 7)

The Standard requires availability of resources needed for planning, implementing, maintenance and continual improvement of actions required by the standard (5.5).

The Standard requires all employees of the owner/manager to be aware of the standard, to be qualified and undergo training (6.3.3.1).

Contractors shall be certified or otherwise demonstrate their competencies, shall be aware of the standard and comply with general terms and conditions for forestry subcontractors (7.6.4).

The Standard requires the owner / manager to communicate with stakeholders. However, the requirement does not include the elements of “effective communication” and “consultation”.

The Standard requires a forest owner/manager declaration (5.1), management plan (6.2.1) and management records (6.2.2). This constitutes fundamental documented information for effectiveness of the sustainable forest management, including their update.

Maintenance and enhancement of forest resources (PEFC ST 1003:2018, 8.1)

The Standard does require to maintain forested area (7.1.1). Individual requirements of the standard ensure that the ecosystems services, economic, ecological, cultural and social values of forest resources are maintained or enhanced.

The Standard includes requirements for maintaining the quality and quantity of forest resources by defining a sustainable harvest and requirements for forest regeneration and silviculture treatment promoting mixed forests (7.3, 7.4).

The Standard includes requirements for climate positive practices, including efficient use of resources and reduction of greenhouse gas emissions (7.1.3).

Forest conversion (PEFC ST 1003:2018, 8.1.4, 8.1.6)

The standard prohibits conversion of forest to non-forest use and to forest plantations with criteria for justified circumstances that cover (i) compliance with legislation; (ii) 5 % maximum threshold; (iii) absence of negative impacts on “ecologically important forest areas, (iv) culturally and socially significant areas, or other protected areas; (v) protection of “high carbon stock”; and (vi) long-term conservation, economic, and social benefits (7.1.1).

The definition of the term “forest plantations” is broader (stricter) than the PEFC definition (PEFC ST 1003:2018) as it also covers forests that are “regularly spaced, even-aged monocultures without undergrowth”. The modification of the PEFC Council definition (PEFC ST 1003:2018) has been considered as complying with Note 3 of the definition of “forest plantation” (PEFC ST 1003:2018) that allows national modifications.

The minor non-conformity has been assigned based on the fact that:

- a) the PCSN I requirements do not include stakeholders consultation as a part of the criteria for justified circumstances;

The criteria for justified circumstances of forest conversion limits a scale of the conversion to a maximum of 5 %. However, it refers to 5 % of “certified area” rather than “forest type within the forest area”. In addition, the 5 % conversion limit applies to a “minimal period of 5 years”. This means that every five years a 5 % of the area can be converted.

The standard does not include an option for conversion of degraded ecosystems.

Afforestation of ecologically important non-forest ecosystems (PEFC ST 1003:2018, 8.1.5)

The Standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (7.1.4).

PCSN I does not allow certification of forest plantations (6). Therefore, forest plantations established by afforestation of ecologically important forest areas are not eligible for PEFC certification (See Appendix 1, PEFC ST 1003:2018).

Maintenance of forest health and vitality (PEFC ST 1003:2018, 8.2.)

The Standard includes requirements relating to the forest health and vitality; avoiding damage to the standing trees and shrubs (7.2.3), promoting regeneration (7.4.3), promoting native species (7.4.4), mixed forests (7.4.6) and dead wood (7.4.11) and restoration of forest ecosystems (7.4.2).

The Standard requires genetic (7.4.3), species (7.4.2, 7.4.3, 7.4.4) and structural diversity (7.4.2, 7.4.6).

The Standard includes requirements restricting the use of fires in forest management (7.2.5).

The Standard includes requirements for usage of site suited species in reforestation and afforestation (7.4.3) and minimisation of damages to trees and to the forest cover (7.2.3).

Waste management (PEFC ST 1003:2018, 8.2.5)

The Standard includes requirements for disposal of waste, (7.5.6), and for avoidance of spillage of oil or fuel (7.2.4) and proper equipment for the pesticides usage (7.2.1.).

However, the wording to the requirement for the waste disposal (7.5.6) is ambiguous (“as much as possible”) and does not ensure that the waste disposal on the forest land is strictly prohibited.

Integrated pest management (PEFC ST 1003:2018, 8.2.6), **usage of pesticides** (8.2.7), and **fertilisers** (8.2.5)

The Standard includes requirements for minimisation of the pesticides usage (7.2.1.); includes requirements for records on the pesticides usage (7.2.4); and proper equipment for the pesticides usage (7.2.1.).

The Standard prohibits the use of chlorinated hydrocarbons. However, the standard does not prohibit pesticides banned by an international agreement. However, the reference to the Ctgb list of authorised substances (the Board for the Authorization of Plant Protection Products and Biocides, a formal Dutch authority) ensures that no substances banned by the international agreements are included. See <https://toelatingen.ctgb.nl/nl/authorisations>.

The Standard includes prohibition of the use of pesticides WHO 1A and 1B class with an exemption clause (7.2.1.). The minor non-conformity was assigned as the PEFC requirement (PEFC ST 1003:2018) state that the derogated substances shall be defined by the national standard. PEFC Netherlands argues that a list of “derogated substances” has been added to PCSN IX. However, the amended version of PCSN IX has not been submitted.

The Standard requires controlled use of fertilisers and prohibits the fertilisers to be used as an alternative to soil nutrient management (7.2.2).

Production function (PEFC ST 1003:2018, 8.3.1, 8.3.2) and **sound economic performance** (8.3.2)

The Standard includes requirements to maintain production capability of forests (7.3.1).

The Standard includes requirements for sound economic performance, consideration of new markets and economic activities (7.6.7).

The Standard includes requirements that forest operation shall not reduce the productive capacity (7.4.3) and shall not damage soil (7.5.1), water (7.5.2) and remaining vegetation (7.2.3).

Sustainable production (PEFC ST 1003:2018, 8.3.4)

The Standard requires a long-term sustainability of wood and non-wood forest products harvesting (7.3.4).

Forest infrastructure (PEFC ST 1003:2018, 8.3.5)

The Standard includes requirements for building forest infrastructure with minimisation of impacts on the environment, water and soil resources; and proper transportation/skidding operations (7.3.5)

Maintenance of biological diversity (PEFC ST 1003:2018, 8.4.1, 8.4.8, 8.4.9, 8.4.10, 8.4.12), protected species (8.4.3)

The Standard includes requirements for conservation, maintenance and enhancement of biodiversity at different levels (7.4.2, 7.4.3).

The Standard requires to protect endangered and threatened species and their habitats. This practically excludes any commercial use of the endangered and protected species (7.4.2, 7.4.7).

The Standard includes requirements promoting horizontal and vertical diversity of forest stands by 20 % threshold of native deciduous species (7.4.4), 50 % threshold of mixed forests (7.4.6) and 2ha maximum of clearcuts.

The Standard includes requirements for protection of valuable ecosystems regardless of whether they were created by traditional management systems or natural succession (7.4.1, 7.4.3, 7.4.8).

The Standard includes requirements for compliance with the Code of Conducts that cover the area of reducing negative impacts of forest operations (7.4.7) and requires avoidance of damages to the remaining vegetation. (7.2.3).

The Standard includes requirements for control of damages caused by animal population both grazing by domestic animals (7.4.9) and by wildlife population (7.4.10), especially in reforestation and afforestation.

Ecologically important forest ecosystems (PEFC ST 1003:2018, 8.4.2)

The Standard requires to identify and protect ecologically important forest areas. The definition of this term refers to areas that are defined by regulations (natura 2000), forestry reserves and A-locations (7.4.1) and cover all four bullet points of the PEFC Council's definition of the ecologically important forest areas (PEFC ST 1003:2018, 3.5).

Natura2000 areas (following the European and Dutch legislation) cover forest areas with

- a) protected, rare, sensitive or representative ecosystems;
- b) habitats of protected and threatened species,
- c) endangered or protected genetic resources,
- d) potential to contribute to landscape diversity and are typical example of 9 European biographical zones.

A-location forests are (<https://edepot.wur.nl/367836>):

The forest consists only of endemic species,

- a) 2. It consists of spontaneous forest or uneven-aged forest with old trees and a management that leaves room for spontaneous development. (3.5 a and 3.5 d)
- b) 3. It occurs on a location that was already forested in 1850, this criterion does not, however, apply to the mixed forests and pine wood communities on former shifting sands (3.5 d)
- c) 4. The forest should preferably be on undisturbed ground with a natural relief, where no digging or trenching has been taken place.

Forest reserves are defined as selected parts of forest areas, reserved for the purpose of gaining knowledge through observation, research and education on spontaneous (i.e. not influenced by man) natural processes.

(<https://edepot.wur.nl/36274#:~:text=Bijlsma%2C%20R.J.%2C%202008.,Alterra%2C%20Alterra%2Drapport%201680.&text=Het%20rapport%20zal%20worden%20gebruikt,monitoring%20en%20onderzoek%20in%20bosreservaten.>).

Regeneration (PEFC ST 1003:2018, 8.4.4, 8.4.6), **local and introduced species** (8.4.5), **GMOs** (8.4.7)

The Standard includes requirements for successful regeneration, being either natural regeneration or planting (7.4.3).

The Standard includes requirements for the usage of species that are included in the Dutch National Catalogue of Tree Varieties (7.4.3). The catalogue is maintained by the Board for Plant Varieties (<https://www.raadvoorplantenrassen.nl/en/about-the-board/>).

The catalogue does include introduced species but they were and are scientifically evaluated before added to the list. Newly added species are being evaluated by the Centre for Genetic Sources, which is part of the Wageningen University and Research Centre: <https://www.wur.nl/nl/Onderzoek-Resultaten/Wettelijke-Onderzoekstaken/Centrum-voor-Genetische-Bronnen-Nederland-1.htm>. More information can be found on: <https://www.rassenlijstbomen.nl/nl/Home.htm>.

The Standard requires to planting activities shall restore the ecological connectivity (7.4.5).

The Standard requires prohibition of the GMO material in planting.

Dead wood (PEFC ST 1003:2018, 8.4.13)

The Standard includes requirements for dead wood with specific threshold of 6 m³ per ha (7.4.11), hollow trees and birds' nesting trees (7.4.12).

Soil protection function (PEFC ST 1003:2018, 8.5.1, 8.5.2, 8.5.3)

The Standard includes requirements for protection of sites with protective functions for society, including identification of such forests, planning and implementing appropriate measure and management in unfavourable forest sites (7.5.1-7.5.5).

The Standard includes requirements for identification and mapping of forests with protective functions in management plans (Appendix 1), including measures to maintain or enhance those functions (7.5.1, 7.3.5, 7.5.5).

The Standard includes requirements for protection of soil against erosion in forest management as well as infrastructure building and maintenance (7.5.1, 7.5.3, 7.3.5) and minimising of pressure of animal population (7.4.10, 7.4.9).

Water protection function (PEFC ST 1003:2018, 8.5.1, 8.5.4)

The Standard includes requirements for water protection, their mapping (Appendix 1) and protection (7.5.2, 7.5.3).

Socio-economic functions of forests (PEFC ST 1003:2018, 8.6.1, 8.6.2, 8.6.3, 8.6.5)

The Standard includes requirements to respect socio-economic functions of forests (7.6.1-7.6.6). Those are also supported by the requirements for the content of the management plan (Appendix 1).

The Standard ensure public access to forests and defines cases where the public access can be restricted (7.6.1).

The Standard requires protection of sites with historical, spiritual and cultural significance (7.6.2).

The Standard only requires communication with stakeholders (5.4) and involvement of those who have user's right in the management planning (7.6.5).

Taking into account the fact that forest-related knowledge, including traditional management systems, is widely available and accessible to forest owners / manager (through education and training), the wording of the Standard is sufficient.

Research (PEFC ST 1003:2018, 8.6.7)

The Standard includes requirements promoting research activities (7.6.6) and for usage of the scientific knowledge (7.6.3).

Monitoring (PEFC ST 1003:2018, 9.1)

The monitoring of working conditions is delivered through requirement 8.1.4 as well as by adherence to the Forests and Nature Health and Safety at Work Manual (<https://www.stigas.nl/agroarbo/bos-en-natuur>) that also requires regular monitoring of the working conditions and provides Checklists for those tasks.

Internal audits (PEFC ST 1003:2018, 9.2), **management review** (9.3) and **improvement** (10)

The Standard includes requirements for internal audits (8.2), management review (8.3) and improvement (9) that are identical to the PEFC requirements.

8.4.2.2 Results of the assessment and non-conformities

The Standard complies with the PEFC requirements described in PEFC ST 1003:2018, except the following minor non-conformities.

PEFC requirement	7.3.1: Effective communication and consultation
Non-conformity No.	5
Type	Minor non-conformity
Description	The Standard requires the owner to communicate with stakeholders (5.4). However, the requirement does not include the elements of “effective communication” and “consultation”.

PEFC requirement	8.1.4 Forest conversion
Non-conformity No.	6
Type	Minor non-conformity
Description	<p>The standard prohibits conversion of forest to non-forest use and to forest plantations with criteria for justified circumstances that cover (i) compliance with legislation; (ii) 5 % maximum threshold; (iii) absence of negative impacts on “ecologically important forest areas, (iv) culturally and socially significant areas, or other protected areas; (v) protection of “high carbon stock”; and (vi) long-term conservation, economic, and social benefits (7.1.1).</p> <p>The definition of the term “forest plantations” is broader (stricter) than the PEFC definition (PEFC ST 1003:2018) as it also covers forests that are “regularly spaced, even-aged monocultures without undergrowth”. The modification of the PEFC Council definition (PEFC ST 1003:2018) has been considered as complying with Note 3 of the definition of “forest plantation” (PEFC ST 1003:2018) that allows national modifications.</p> <p>The minor non-conformity has been assigned based on the fact that:</p> <ul style="list-style-type: none"> b) the PCSN I requirements do not include stakeholders consultation as a part of the criteria for justified circumstances; c) The criteria for justified circumstances of forest conversion limits a scale of the conversion to a maximum of 5 %. However, it refers to 5 % of “certified area” rather than “forest type within the forest area”. In addition, the 5 % conversion limit applies to a “minimal period of 5 years”. This means that every five years a 5 % of the area can be converted.

PEFC requirement	8.2.5 Disposal of waste
Non-conformity No.	7
Type	Minor non-conformity
Description	<p>The Standard includes requirements for disposal of waste, (7.5.6), and for avoidance of spillage of oil or fuel (7.2.4) and proper equipment for the pesticides usage (7.2.1.).</p> <p>However, the wording to the requirement for the waste disposal (7.5.6) is ambiguous (“as much as possible”) and does not ensure that the waste disposal on the forest land is strictly prohibited.</p>

PEFC requirement	8.2.8 WHO 1A and 1B pesticides
Non-conformity No.	8
Type	Minor non-conformity
Description	<p>The Standard includes prohibition of the use of pesticides WHO 1A and 1B class with an exemption clause (7.2.1.) allowing the use where no other viable option exists.</p> <p>The minor non-conformity was assigned as the PEFC requirements state that the derogated substances shall be defined by the national standard. PEFC Netherlands argues that a list of “derogated substances” has been added to PCSN IX. However, the amended version of PCSN IX has not been submitted.</p>

Observation (that do not represent non-conformity with the PEFC requirements)

“Management system” terminology

The standard uses variable terms for non/conformities (chapter 8) such as “anomaly” or “deviations”. This could create confusion amongst the readers and users of the standard.

8.5 Requirements for “Trees outside Forests” (ToF)

8.5.1 Introduction and summary

Structure of the Standard

The requirements for the ToF standard are defined in PCSN I in the core part of the document that is common for both the SFM and ToF certification, with an Appendix 2 that interprets specific requirements of the core part for the purposes of the ToF certification.

PEFC Netherlands has chosen the same approach as applied by PEFC ST 1003:2018 that is based on the following principles:

- a) Requirements in PCSN I, core part are also applicable to the ToF certification,
- b) Any modifications, alterations, interpretations or additional requirements are defined in Appendix 2 to PEFC I.

Similarly to PEFC ST 1003:2018, PCSN also provides a statement (PCSN I, Appendix 2) that all criteria defined for “forests” apply to “Trees outside Forests”, except where Appendix 2 provides specific interpretation. Therefore, the wording “forests” in the core part of PCSN I is interpreted as ToF.

Appendix 2 includes categorization of the ToF into four (4) categories (rural extensive / rural intensive / urban extensive / urban intensive) and then includes interpretations of some of the PCSN I requirements described in the core part of the document for the purposes of:

- a) Rural extensive; and
- b) Urban extensive.

The rural and urban intensive ToFs are not eligible for PEFC certification.

Definition of the ToF

The scope of the ToF requirements and certification is defined by two terms, “*forest*” and “*Trees outside Forests*” of PCSN I. Those definitions make “forest” and “Trees outside Forests” exclusive terms that do not overlap.

3.2 Forest

An area larger than 0.5 hectares, with trees in excess of 5 metres tall, with a canopy cover greater than 30%, or with trees which can reach these defining values. This includes recent clearing areas, forest paths and permanent wooden stacks. It does not include areas predominantly deployed for urban or agricultural use. Orchards and Christmas tree farms are classed as agricultural use.

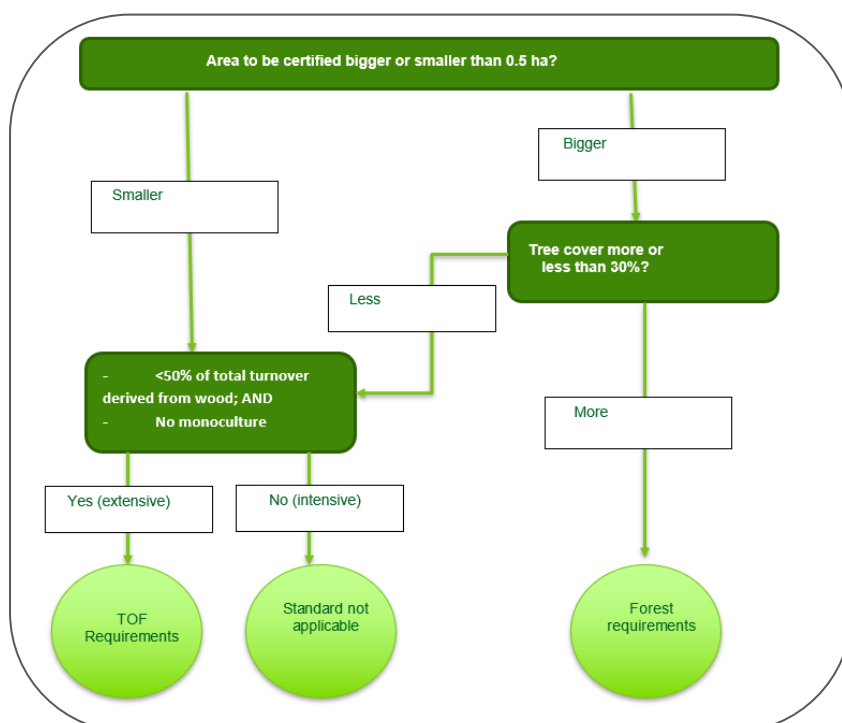
3.3 Trees outside Forests (ToF)

Trees that grow outside **forest** areas and mostly in areas designated as agriculture or urban. These include smaller units of forest (<0.5 ha), landscape plantings, row and avenue plantings, and urban green space.

The following criteria have been defined to differentiate between “extensive” and “intensive” ToFs:

- size of ToF to be certified (<0.50 ha);
- tree cover (<30 % tree cover);
- turnover (<50 %).

Categorisation of “Forests” and “ToF”



Exclusion of requirements for ToF

PCSN I (Appendix 2) does not use an option of excluding some of the SFM requirements for “extensive” ToFs (PEFC ST 1003:2018, Appendix 2/D).

8.5.2 Assessment of the ToF Requirements

The ToF standard (PCSN I, including Appendix 2) has been assessed against the PEFC Council requirements that are defined in PEFC ST 1003:2018, including Appendix 1.

The report includes the following parts relating to the assessment of the ToF requirements' compliance with PEFC ST 1003:201(8, including Appendix 2):

- a) Summary description of the Standards' compliance with PEFC ST 1003:2018 is described in chapter 8.5.2.1;
- b) Assessment results is included in chapter 8.5.2.2;
- c) Detailed assessment of individual PEFC requirements, including assessment conclusion and justifications are included in Annex D to this report.

8.5.2.1 Description of the ToF standards' compliance with PEFC ST 1003:2018

Summary of modifications/interpretations for ToF certification (PCSN I, Appendix 2)

The following table provides a summary of requirements that have modified / interpreted in Appendix 2 of PCSN I.

Modified requirements		
Requirement (PCSN I)	Topic	Summary of modification / interpretation
4.3, 5.1, 5.3, 6.1.1, 7.6.3, 7.6.6	Wording "forest", "SFM"	The modification only applies to change of the word "forest" and/or "SFM" to "ToF" and/or sustainable management of ToF.
6.3.2.1, 7.2.1g	Health and safety	Reference to a Health and Safety Manual that is relevant to the management of ToF.
7.1.1	Forest conversion	ToF areas established by forest conversion after 31/12/2010 not eligible for PEFC certification.
7.1.4	Afforestation	ToF areas established by afforestation of ecologically significant non-forest areas not eligible for PEFC certification.
4.3 (7.5.2)	Usage of tree species	Simplification of the requirement with focus on "tree species appropriate to the area".
7.4.6	Mixed forests	Changes in thresholds for mixed forests and deadlines for transitions.
7.4.9	Grazing	Grazing only allowed if long-term survival of trees is ensured
7.4.13	Clearcuts	ToF can not to be harvested at the same time.
7.6.4	Contractors certification	Changes in a type of ToF contractor's certification.

New requirements		
Requirement (PCSN I)	Topic	Summary of modification / interpretation
7.2.3	Damage to trees	Tree survey to be completed in urban areas in case of construction within the canopy projection.
New	Traditional knowledge / best practice	Usage of traditional knowledge and best practice in agroforestry and ToF management.

Exempted requirements		
Requirement (PCSN I)	Topic	Summary of modification / interpretation
7.3.3	Biomass removal	Not applicable in urban ToF
7.4.10	Wildlife population	Not applicable (see Annex D, 8.4.12)

8.5.2.2 Results of the assessment and non-conformities

The assessment identified the following minor non-conformities with the PEFC requirements (PEFC ST 1003:2018, including Appendix 1).

All non-conformities identified for the SFM standard (see chapter 8.4.2.2) also apply for the ToF standard with the following additional non-conformities.

PEFC requirement	8.4.5 Introduced species
Non-conformity No.	9
Type	Minor non-conformity
Description	The standard requires to use species that are “appropriate” to the area where they grow”. However, the wording is not sufficiently detailed to satisfy the PEFC requirement relating to the introduced species

PEFC requirement	Appendix 2 / Section E: Categorisation of ToF
Non-conformity No.	10
Type	Minor non-conformity
Description	PCSN I does define four categories of ToF when two of them “rural extensive” and “urban extensive” are eligible for PEFC certification. The standard defines the following criteria to differentiate between “extensive” and “intensive”: <ul style="list-style-type: none"> - size of ToF to be certified (<0.50 ha); - tree cover (<30 % tree cover);

- turnover (<50 %).

The minor non-conformity has been assigned based on the following arguments:

- a) it is not clear how the threshold of 0.50 ha will be applied. Is it a cumulative area of ToF on a management unit or a single plot of ToF. As PCSN I refers to “area to be certified” it can be assumed that the total (cumulative) area of ToF is less than 50 %. It is very unlikely that any farm unit or any municipality would apply for PEFC certification to obtain and benefit from less than 0.50 ha of certified ToF.
- b) The criterion of “tree cover” has very limited value in differentiation between intensive and extensive management as it applies to the coverage of the whole “municipality area” or “farm”. It is very unlikely, that “tree coverage” of the whole municipal area or the whole agriculture farm would exceed 30 %, especially when the area of the ToF shall be smaller than 0.50 ha.
- c) The criterion of turnover is ambiguous. It is rather clear that income from wood refers to the sale of wood (or trees) from the ToF. However, it is not clear what the total turnover would be, is it only income from the ToF area or a budget of the whole municipality or income of the whole farm. It is very unlikely that wood/trees income would exceed 50 % of the whole municipality budget or a farm turnover when the certified area is limited by 0.50 ha.
- d) A “management intensity” criterion has not been defined;
- e) A criterion of “scale of cultural, ecological and conservation value” has not been defined.

However, it should be noted that Section E of Appendix 2 (PEFC ST 1003:2018) refers to the categorization of the ToF for a single purpose, i.e. potential exception of some requirements for “extensive” types of the ToF. PCSN I does not apply any exception from the requirements included in PEFC ST 1003:2018. Therefore, regardless of whether the ToF are classified as “extensive” or “intensive”, the PCSN requirements they would still comply with the PEFC requirements.

Observation (that do not represent non-conformity with the PEFC requirements)**Incorrect references to PCSN chapters**

PCSN I, Appendix 2 includes a mistake in numbering of chapters. The chapter 7.5.2 in Appendix 2 should properly refer to chapter 7.4.3 in the core part of the PCSN I document.

PCSN I, Appendix 2 also includes wrong references in case of requirements 5.5.1 / 6.1.1.

8.6 Chain of custody requirements

The applicant has not submitted for the assessment and the PEFC endorsement its own scheme specific chain of custody standard and its own, scheme specific requirements for chain of custody certification bodies. The PEFC endorsement application included the PEFC Council's international standards PEFC ST 2002:2020 that was adopted by the PEFC Netherlands as a part of the scheme.

Therefore, the assessment of the chain of custody requirements is only focused on whether or not the applicant formally adopted PEFC ST 2002:2020 as a part of its scheme and PEFC ST 2002:2020 is mandatorily required to be used for the purposes of chain of custody certification.

- The PEFC Netherlands submitted a document identified as PCSN III with the front page relating to the PEFC Netherlands and the remaining pages of the document are identical with PEFC ST 2002:2020 as adopted by the PEFC Council.

Conclusion

The applicant adopted the PEFC international standard for chain of custody (PEFC ST 2002:2020) directly by approving the standard as a part of the scheme.

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8.7 Requirements for certification bodies

8.7.1 Requirements for chain of custody certification bodies

The applicant's scheme has adopted the PEFC international chain of custody standard for the purposes of chain of custody certification (See chapter 8.6).

Therefore, the applicant is expected to also formally adopt the PEFC international requirements for chain of custody certification bodies (PEFC ST 2003:2020) without any modifications. The applicant is not allowed to develop any scheme specific requirements for chain of custody certification bodies.

Therefore, the assessment is focused on:

- a) Formal adoption of PEFC ST 2003:2020 by the applicant as a part of the scheme and a sole document with requirements for chain of custody certification bodies;
- b) Whether or not the applicant developed scheme specific requirements for chain of custody certification bodies.

Formal adoption of PEFC ST 2003:2020

- The PEFC Netherlands has not submitted any document relating to the requirements for chain of custody certification bodies. While, PEFC ST 2002:2020 has been formally adopted by the PEFC Netherlands as PCSN III, PEFC ST 2003:2020 is not included within the structure of the PEFC scheme documentation (PCSN System Description);
- PEFC Netherlands is notifying the chain of custody certification bodies based on notification contract that includes an explicit reference to PEFC ST 2003:2020.

The scheme has not formally adopted PEFC ST 2003:2020 as a part of the PCSN scheme. However, the notification contract with certification bodies includes an explicit reference to PEFC ST 2003:2020.

8.7.2 Requirements for forest management certification bodies

8.7.2.1 Introduction and summary

Coverage and scope of requirements

The requirements for certification bodies for forest management certification are described in PCSN IV.

Structure of the document (PCSN IV)

The document is logically structured following the structure of ISO/IEC 17021-1 and includes:

1. Scope;
2. Normative references;
3. Terms and definitions;
4. Principles;
5. General requirements;
6. Structure requirements;
7. Resources requirements;
8. Information Requirements,
9. Process requirements;
10. Management system requirements;

In addition, it also includes an Appendix for “Group certification of forest and tree management.

Certification and accreditation framework

PCSN IV is based on and makes mandatory reference to ISO/IEC 17021-1 and as such considers the forest management certification as the “management system certification”.

PCSN IV requires certification bodies to be accredited and to conduct the certification as “accredited certification”. The accreditation shall be issued by an accreditation body that is a member of IAF.

Competencies of the certification body and auditors

PCSN IV requires that the certification body shall have competencies in forest management and the PEFC forest certification scheme. This is delivered through comprehensive requirements for auditors, including their education, working experience, audit experience training, competences and knowledge and monitoring of auditor performance.

Those requirements are meeting and significantly exceeding the PEFC requirements.

Stakeholders' consultation

PCSN IV requires stakeholders' consultation to be included in the certification process together with collection and analysis of data from external sources.

Public availability of the certification report summary

PCSN IV requires that the certification body prepares certification report that is made publicly available by the certified client.

Notification of certification bodies

PCSN IV requires that the certification bodies for forest management certification shall be notified by the PEFC Netherlands.

8.7.2.2 Assessment conclusions

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

Observations (not causing non-conformities with the PEFC requirements)

Observation – references to ISO/IEC 17021-1 requirements

There is some inconsistency in using the references. For example, under chapter 5 (Structural requirements), PCSN IV states "All the principles given in clause 5.1 of ISO/IEC 17021-1 shall apply". However, this results in a situation that chapters 5.2 and 5.3 of ISO/IEC 17021-1 are not covered by the PCSN reference.

In addition, PCSN IV should refer to "requirements" or "clauses" as "Principle" is too general term for this purpose.

This inconsistency was not classified as non-conformity because PCSN II clearly indicates the accreditation by an IAF member and the accreditation body will always request compliance with all requirements of ISO/IEC 17021-1.

Observation – ISO 19011 references

ISO 19011 standard is referenced in requirements of the PCSN IV document. However, the ISO standard is not listed in chapter "Normative References" of PCSN IV.

Annex A: Detailed assessment of the standard setting procedures and the standard setting process

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
Standardising Body			
5.1.1 The standardising body shall have written procedures for standard-setting activities describing:			
(a) its legal status and organisational structure, including a body responsible for consensus-building (working group, refer to 6.4) and procedures for formal adoption of the standard (refer to 7.1),	Procedures	YES	<p>PCSN V</p> <p>6.4.1 “The Board of PEFC Netherlands shall establish a National PEFC Forum in accordance with articles 18.1 and 18.2 of its constitution”.</p> <p>7.1 “The final draft standard shall be submitted for endorsement to the general assembly of PEFC Netherlands if there is consensus”.</p> <p>Compliance: Conformity</p> <p>Justification: PCSN V describes the role of the “National PEFC Forum” as the body responsible for consensus building and the General Assembly of PEFC Netherlands as a body for formal approval of the scheme’s forest management standard (PCSN I).</p> <p>Although PCSN V does not explicitly state that PEFC Netherlands the standardization body with a legal status, it is implicit from the context of PCSN V.</p>
(b) procedures for keeping documented information,	Procedures	YES	<p>PCSN V</p> <p>5.1.1 “PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of: a) The standard development procedures b) A list of stakeholders c) A list of stakeholders contacted d) Stakeholders involved in standard development activities, including stakeholders present in meetings of the PEFC Forum. (e) Feedback received and how it has been incorporated (f) All draft versions of the standard (g) Outcomes of the PEFC Forum h) Evidence of consensus for the final version of the standard i) Evidence related to the assessment process; and j) Final approval of the General Assembly of PEFC Netherlands”.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for keeping documented information.</p>
(c) procedures for balanced representation of stakeholders,	Procedures	YES	<p>6.4.2 “The National Forum shall: a) have a balanced representation of the different spheres of interest and be constituted in such a way that none of the spheres of interest dominates the decision making b) include stakeholders with relevant expertise in relation to the subject matter of the standard. Enough relevant stakeholders will participate”.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for balanced representation of stakeholders.</p>

PEFC benchmark requirement	Assessment basis	YES/NO	Reference to system documentation (including quotation of relevant text)
(d) the standard-setting process,	Procedures	YES	<p>PCSN V, chapter 6 defines the standard setting process.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for standard setting process.</p>
(e) the mechanism for reaching consensus, and	Procedures	YES	<p>PCSN V, chapters 6.4.5-6.4.8 define the decision making of the Forum's and consensus building.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for reaching consensus.</p>
(f) review and revision of standard(s)/normative document(s).	Procedures	YES	<p>PCSN V, chapter 8 defines procedures for review of the standard and chapter 9 for revision of the standard.</p> <p>Compliance: Conformity</p> <p>Justification: The document includes procedures for review and revision.</p>
5.1.2 The standardising body shall make its standard-setting procedures publicly available and shall review its standard-setting procedures regularly. The review shall consider feedback from stakeholders.	Procedures	YES	<p>PCSN V, chapter 5.1.2 "PEFC Netherlands shall keep all relevant documents and information, such as minutes and communications about the progress of the draft versions of the standard or of its revision for at least five years and make them publicly available through its website, or otherwise on request".</p> <p>PCSN V, chapter 5.1.4 "PCSN V shall be reviewed during every periodic review taking the feedback from stakeholders into consideration".</p> <p>Compliance: Conformity</p> <p>Justification: PCSN V states that all relevant documents shall be publicly available. This also implies that PCSN is should be made publicly available.</p> <p>PCSN V requires the standard setting procedures to be periodically reviewed as a part of the review process, i.e. no later than 5 years after formal approval of the forest management standard.</p>
	Process	NO	<p>Public availability of the standard setting procedures: PEFC Netherlands has published its standard setting procedures (PCSN V, version 2016) at its website dedicated to the revision process (www.pefc.nl/forum).</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>PCSN V (version 2016 and 16/2/2021) is available at the PEFC Netherlands' website (www.pefc.nl/forum).</p> <p>The expectation of the PEFC requirement is that the standard setting procedures document (as well as other parts of the scheme's documentation) is permanently accessible to stakeholders (not only during the standard setting process). Although the document (PCSN V) is publicly available, the access to this document is very complicated as a person searching for the document would need to know the structure of the PEFC</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Netherlands' website and go to the fourth level of the website (certification => forest certification => national PEFC Forum => a link to the document.</p> <p>In addition, the PCSN V document was amended as a part of the PEFC assessment process in order to respond to the non-conformities of a draft interim report. However, this version of the document (24/9/2021) is not available at the PEFC Netherlands website and it is not clear under which section of the website the document would be published.</p> <p>Review of the standard setting procedures:</p> <p>The PEFC Netherlands' website (www.pefc.nl/forum) includes a version 2016 of PCSN V as well as the version submitted for the PEFC endorsement in 2021. The 2016 version has been presented as a part of the standard setting process with invitation of comments and then reviewed/revised by the Forum at its first meeting in September 2019^[1] to govern the standard setting process.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands reviewed the standard setting procedures taking into considering stakeholders views.</p>
5.2.1 The standardising body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardising body's own procedures includes:			
(a) Standard-setting procedures,	Procedures	YES	<p>PCSN V</p> <p>5.1.1 "PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of: a) The standard development procedures,..."</p> <p>Compliance: Conformity</p> <p>Justification: The scheme keeps standard setting procedures.</p>
	Process	YES	<p>PEFC Netherlands has developed standard setting procedures (PCSN V) that is available at the PEFC Netherlands website. (www.pefc.nl/forum)</p> <p>Compliance: Conformity</p> <p>Justification: The scheme keeps standard setting procedures and makes it publicly available through its website.</p>
(b) Stakeholder identification mapping,	Procedures	YES	<p>PCSN V</p> <p>5.1.1 "PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... b) Stakeholder identification mapping..."</p> <p>Compliance: Conformity</p> <p>Justification: PCSN V requires to keep as records (documented information) stakeholders identification mapping.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>PEFC Netherlands provided a document outlining the stakeholders mapping identifying relevant stakeholder categories, key issues, motives for participation and key stakeholders for each of the category^[32]. As a part of the in-country visit the assessor reviewed a stakeholders mapping table with a list of identified stakeholders^[33].</p> <p>Compliance: Conformity</p> <p>Justification: PEFC Netherlands keeps records on stakeholders mapping.</p>
(c) Contacted and/or invited stakeholders	Procedures	YES	<p>PCSN V</p> <p>5.1.1 “PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... c) A list of stakeholders contacted,...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN satisfies the PEFC requirements.</p>
	Process	YES	<p>As a part of the in-country visit, the assessor reviewed the records relating to direct invitation of stakeholders to nominate representatives to the Forum / announcement of the start of the process^[34] and public consultation^[36].</p> <p>Compliance: Conformity</p> <p>Justification: PEFC Netherlands keeps records on stakeholders communication.</p>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	YES	<p>PCSN V</p> <p>5.1.1 “PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... d) Stakeholders involved in standard development activities, including stakeholders present in meetings of the PEFC Forum,...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN satisfies the PEFC requirements.</p>
	Process	YES	<p>PEFC Netherlands provided a list of members of the Forum (Annex E) as well as minutes of the Forum’s meetings^[1-7] showing participation of the members in the standardisation activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands keeps records of the stakeholders participating in the standardization activities.</p>
(e) Feedback received and a synopsis of how	Procedures	YES	<p>PCSN V</p> <p>5.1.1 “PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
feedback was addressed,			documents consist of:... (e) Feedback received and how it has been incorporated,..." Compliance: Conformity Justification: PCSN satisfies the PEFC requirements.
	Process	YES	PEFC Netherlands claims that it had received no comments in the public consultation ^[8] except comments from one stakeholder (Wageningen University) that were received after the formal public consultation period. Those comments were considered by the Forum ^[7] and outcome communicated to the stakeholder ^[38] . Compliance: Conformity Justification: PEFC Netherlands keeps records on comments received from stakeholders.
(f) All drafts and final versions of the standard,	Procedures	YES	PCSN V 5.1.1 "PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... (f) All draft versions of the standard,..." Compliance: Conformity Justification: PCSN satisfies the PEFC requirements.
	Process	YES	Compliance: Conformity Justification: As a part of the evaluation, PEFC Netherlands provided several evidences that confirmed that different versions of the forest management standard have been kept. The versions have been provided to members of the Forum ^[16-23] .
(g) Outcomes from working group considerations,	Procedures	YES	PCSN V 5.1.1 "PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... (g) Outcomes of the PEFC Forum,..." Compliance: Conformity Justification: PCSN satisfies the PEFC requirements.
	Process	YES	PEFC Netherlands kept minutes of the Forum meetings ^[1-7] that include outcomes from the Forum's consideration. Compliance: Conformity Justification: PEFC Netherlands keeps records on the Forum's meetings.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(h) Evidence of consensus on the final version of the standard(s),	Procedures	YES	<p>PCSN V</p> <p>5.1.1 “PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... h) Evidence of consensus for the final version of the standard,...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN satisfies the PEFC requirements.</p>
	Process	YES	<p>The Forum made approved the final draft standard (PCSN I) at its last meeting of 9 October 2020 except remaining three criteria^[7]. The Forum made a decision that the remaining three criteria will be further developed and agreed in a postal ballot^[7].</p> <p>The postal ballot was organised by an email distributed to members of the Forum on 19/10/2020^[9] with deadline of 23/10/2021. The conditions of the postal ballot indicated that no response was received and thus the three remaining criteria have been approved.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands keeps records on the Forum’s decisions.</p>
(i) Evidence relating to the review process, and	Procedures	YES	<p>PCSN V</p> <p>5.1.1 “PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... i) Evidence related to the review process,...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires to keep records related to the review of the standard.</p>
	Process	YES	<p>Feedback mechanism</p> <p>PEFC Netherlands indicated that its website (https://pefc.nl/boscertificering-documentatie/) includes on-going invitation to stakeholders to submit comments / questions relating to the forest management standard. PEFC Netherlands claims that it had had received no comments to the current standards.</p> <p>Gap analysis</p> <p>PEFC Netherlands carried out a GAP analysis^[10] with the PEFC requirements (PEFC ST 1003:2018). The document was available to the PEFC Netherlands’ BoD and the Forum.</p> <p>The Gap analysis were considered by the PEFC Netherlands BoD in March 2019^[11,13] that decided to revise the standard (PCSN I).</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			PEFC Netherlands carried out the Gap analysis and has in place a mechanism for collecting feedback on the existing standard. However, PEFC Netherlands claims that it had had received no comments to the current standards.
(j) Final approval by the standardising body.	Procedures	YES	<p>PCSN V</p> <p>5.1.1 “PEFC Netherlands shall keep relevant documents on the assessment process of PEFC International. These relevant documents consist of:... j) Final approval of the General Assembly of PEFC Netherlands,...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirements.</p>
	Process	YES	<p>PEFC Netherlands reports in the Development report^[11] that the standard was formally approved by the PEFC Netherlands General Assembly on 5 November 2020 that is recorded in the minutes from the meeting.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands has not provided minutes of the General Assembly meeting.</p>
5.2.2 Documented information shall be kept until completion of the next review or revision of the standard to which they refer. Otherwise the documented information must be kept for a minimum of five years after publication of the standard.	Procedures	YES	<p>PCSN V</p> <p>5.1.2 “PEFC Netherlands shall keep all relevant documents and information, such as minutes and communications about the progress of the draft versions of the standard or of its revision for at least five years and make them publicly available through its website, or otherwise on request”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirements.</p>
	Process	YES	<p>PEFC Netherlands provided screenshot of its computer directory which shows that the records relating to the original development of the PCSN scheme (2010) are still retained.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands still retains records from the original development of the PCSN scheme.</p>
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	YES	<p>PCSN V</p> <p>5.1.2 “PEFC Netherlands shall keep all relevant documents and information, such as minutes and communications about the progress of the draft versions of the standard or of its revision for at least five years and make them publicly available through its website, or otherwise on request”.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>5.1.3 “Documented information will be made available upon request”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirements.</p>
	Process	YES	<p>The documented information was available to stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The evidence provided by the applicant (see chapter 6) do not indicate that PEFC Netherlands refused any request from a stakeholder for documented information retained.</p>
<p>5.3.1 The standardising body shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard-setting activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the standardising body shall:</p>			
(a) acknowledge receipt of the complaint or appeal to the complainant,	Procedures	YES	<p>PCSN V</p> <p>5.2.1 “All complaints related to the standard setting process may be lodged with the national secretary of PEFC Netherlands and will be dealt with according to the PEFC Netherlands Complaints Procedure (PCSN VIII). The contact details can be found on the website of PEFC Netherlands”.</p> <p>PCSN VIII</p> <p>5.2 “The bureau of PEFC Netherlands shall without delay: a) acknowledge to the complainant (in writing) the receipt and subject of the complaint or rejection of the complaint with justification if the complaint is not in accordance with clause 4.1”.</p> <p>PCSN VII</p> <p>4.4 “The College of Appeal shall without delay acknowledge the appellant in writing on the receipt of the letter of appeal”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V makes reference to the PEFC Netherlands complaints procedures (PCSN VIII). The appeals are dealt in accordance with the PEFC Netherlands appeal procedures (PCSN VII).</p> <p>Observation</p> <p>It should be noted that a document called “System description” includes wrong references to the PCSN documentation as PCSN VII is referenced as complaints procedures and PCSN VIII as appeal procedures.</p>
	Process	YES	<p>PEFC Netherlands claims that it has received no complaint relating to the standard setting activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The PEFC Netherlands claim has been verified during the stakeholders online survey and interviews. No information has been received that would indicate submission of a complaint / appeal.
(b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal,	Procedures	YES	<p>PCSN V</p> <p>5.2.1 “All complaints related to the standard setting process may be lodged with the national secretary of PEFC Netherlands and will be dealt with according to the PEFC Netherlands Complaints Procedure (PCSN VIII). The contact details can be found on the website of PEFC Netherlands”.</p> <p>PCSN VIII</p> <p>6.1 “The bureau of PEFC Netherlands will investigate the complaint and seek a resolution. On his request, the complainant can further explain the complaint in person at the bureau of PEFC Netherlands”.</p> <p>6.2 “The bureau of PEFC Netherlands will send a report, including the complaint, the findings of the bureau and the proposed resolution, to the Board of Directors of PEFC Netherlands”.</p> <p>6.3 “The Board of Directors decides on the complaint resolutions based on recommendations by the bureau of PEFC Netherlands”.</p> <p>PCSN VII</p> <p>6.1 “The chairman of the College of Appeal shall allow PEFC Netherlands to file a defense within four weeks after the appeal letter was received”.</p> <p>6.2 “Any stakeholder can request at the chairman of the College of Appeal to become appointed as a party in the procedure”.</p> <p>6.3 “The College of Appeal shall hear all parties, unless all parties have declared not to make use of the right to be heard. The College of Appeal sends all files and documents relating to the appeal to the parties”.</p> <p>6.4 “The chairman of the College of Appeal decides, on the shortest possible notice, on the location, date and time of the handling of the appeal, taking into account the requirements above and informs the concerned parties hereof in writing. 6.5 Parties have the right to be accompanied by a counselor at the hearing”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V makes reference to the PEFC Netherlands complaints procedures (PCSN VIII). The appeals are dealt in accordance with the PEFC Netherlands appeal procedures (PCSN VII). Both, PCSN VIII and PCSN VII include procedures for impartial evaluation of complaints.</p>
	Process	YES	<p>PEFC Netherlands claims that it has received no complaint relating to the standard setting activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The PEFC Netherlands claim has been verified during the stakeholders online survey and interviews. No information has been received that would indicate submission of a complaint / appeal.
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	YES	<p>PCSN V</p> <p>5.2.1 “All complaints related to the standard setting process may be lodged with the national secretary of PEFC Netherlands and will be dealt with according to the PEFC Netherlands Complaints Procedure (PCSN VIII). The contact details can be found on the website of PEFC Netherlands”.</p> <p>PCSN VIII</p> <p>6.4 “The Board of Directors informs the complainant in writing on the outcome of the complaint resolution process.”.</p> <p>PCSN VII</p> <p>6.9 “The College of Appeal shall declare its judgment, on the shortest notice, after the hearing. The judgment shall be sent to the parties. The original shall be filed in the archives of the College of Appeal”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V makes reference to the PEFC Netherlands complaints procedures (PCSN VIII). The appeals are dealt in accordance with the PEFC Netherlands appeal procedures (PCSN VII). Both, PCSN VIII and PFCS VII require the result of the complaints/appeals investigation to be communicates to involved parties.</p>
	Process	YES	<p>PEFC Netherlands claims that it has received no complaint relating to the standard setting activities.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The PEFC Netherlands claim has been verified during the stakeholders online survey and interviews. No information has been received that would indicate submission of a complaint / appeal.</p>
5.3.2 The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	Procedures	YES	<p>PCSN V</p> <p>5.2.1 “All complaints related to the standard setting process may be lodged with the national secretary of PEFC Netherlands and will be dealt with according to the PEFC Netherlands Complaints Procedure (PCSN IX). The contact details can be found on the website of PEFC Netherlands”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires the complaints relating to the standard setting to be sent to the national secretary of PEFC Netherlands and refers to PEFC Netherlands website for contact details.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	Compliance: Conformity Justification: The scheme documentation and contact details of PEFC Netherlands are available from the applicant website and is easily accessible to stakeholders.
Standard-setting process			
6.1.1 For the creation of a new standard, the standardising body shall develop a proposal including:			
(a) the scope of the standard,	Procedures	YES	PCSN V 6.1.1 “For the creation of a new standard, PEFC Netherlands shall develop a proposal containing the following information: a) The scope of the standard”. Compliance: Conformity Justification: PCSN V satisfies the requirement.
	Process	YES	PEFC Netherlands developed a proposal for the revision of the PCSN scheme that includes a scope of revision specifically for each of the PCSN document. Compliance: Conformity Justification: PEFC Netherlands developed a proposal for the revision of the PCSN scheme ^[12] that includes a scope of revision specifically for each of the PCSN document.
(b) a justification of the need for the standard,	Procedures	YES	PCSN V 6.1.1 “For the creation of a new standard, PEFC Netherlands shall develop a proposal containing the following information: b) Reasoning why the standard is needed,..”. Compliance: Conformity Justification: PCSN V satisfies the requirement.
	Process	N/A	Compliance: Not applicable Justification: The PEFC requirement is not required for revision of an existing standard (PEFC ST 1001:2017, 6.1.2).
(c) a clear description of the intended outcomes	Procedures	YES	PCSN V

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>6.1.1 “For the creation of a new standard, PEFC Netherlands shall develop a proposal containing the following information: c) A clear description of the expected outcomes,...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>The proposal document^[12] describes intended outcome of the revision for each of the document of the PCSN scheme.</p> <p>Note: It should be noted that this PEFC requirement is not required for revision of an existing standard.</p>
(d) a risk assessment of potential negative impacts arising from implementing the standard, such as	Procedures	YES	<p>PCSN V</p> <p>6.1.1 “For the creation of a new standard, PEFC Netherlands shall develop a proposal containing the following information: d) A risk analysis of potential negative outcomes arising from implementation of the standard such as;</p> <ol style="list-style-type: none"> 1. Factors that may adversely affect the achievement of the objectives, 2. Unintended consequences of implementation, 3. Actions that address the identified risks,”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The PEFC requirement is not required for revision of an existing standard (PEFC ST 1001:2017, 6.1.2).</p>
(e) a description of the stages of standard development and their expected timetable.	Procedures	YES	<p>PCSN V</p> <p>6.1.1 “For the creation of a new standard, PEFC Netherlands shall develop a proposal containing the following information...:</p> <p>d) A risk analysis of potential negative outcomes arising from implementation of the standard such as;</p> <ol style="list-style-type: none"> 1. Factors that may adversely affect the achievement of the objectives, 2. Unintended consequences of implementation, 3. Actions that address the identified risks, 4. A description of the stages in the standards development process and the expected timeframe.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>e) A description of the stages of standard development and their expected timetable”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires in 6.1.1 that the stages and timetable of the standard setting shall be included in the Standard Proposal.</p> <p>Observation:</p> <p>PCSN V includes unnecessary duplication in its wording as the description of the stages of the standard development and expected timetable is covered under risk analysis (6.1.1d) as well as under an alone standing requirement (6.1.1e).</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>The proposal document^[12] includes description of the revision process and its timetable.</p>
6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.	Procedures	NO	<p>PCSN V</p> <p>6.1.2 “For revisions to a standard, the proposal shall include, at a minimum, parts (a) and (e) of Criterion 5.1.1”.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>PCSN V requires in 6.1.2 that the Standard Proposal for revision shall only include limited elements.</p> <p>However, the reference in PCSN V, 6.1.2 is wrong as chapter 5.1.1 does not relate to the Standard Proposal but to “documented information”.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>The proposal document^[12] includes all elements that are required for the revision process.</p>
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	Procedures	YES	<p>PCSN V</p> <p>6.2.1 “PEFC Netherlands shall identify stakeholders relevant to the purpose and scope of the standard development process. In addition, PEFC Netherlands shall define which spheres of interest are relevant to the subject matter under discussion and why that sphere of interest is relevant. For each sphere of interest PEFC Netherlands shall identify the main issues at stake and the best way to reach those stakeholders within the sphere of interest”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires identification of stakeholders, stakeholder groups (spheres of interest), key issues and best way to reach the stakeholders.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
stakeholders, and which means of communication would be best to reach them.	Process	YES	<p>PEFC Netherlands provided a document outlining the stakeholders mapping identifying relevant stakeholder categories, key issues, motives for participation, key stakeholders and means of communication for each of the categories^[32]. As a part of the in-country visit the assessor reviewed a stakeholders mapping table with a list of identified stakeholders^[33].</p> <p>The stakeholders mapping^[33] identified stakeholders under the following categories: Forest owners (19), Business and industry (13), Non-timber users (4), non-governmental organisations (10), Employees / workers (2), Scientific and technological community (8), Certification bodies (4), ToF (5) and Government (2). Amongst those stakeholders, the mapping identified key stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholder mapping identified relevant stakeholders and for each of the predefined stakeholder categories identified key issues, motives for participation, key stakeholders and means of communication.</p>
<p>6.2.2 Identification of stakeholder groups shall be based on nine major stakeholder groups as defined by Agenda 21 of the <i>United Nations Conference on Environment and Development</i> (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the stakeholder mapping:</p> <ul style="list-style-type: none"> • forest owners, • business and industry, • indigenous people, • non-government organisations, • scientific and technological community, • workers and trade unions. <p>Other groups shall be added if relevant to the scope of standard-setting activities.</p>	Procedures	YES	<p>PCSN V</p> <p>6.2.2 “The spheres of interest of stakeholders are based on the nine spheres of interest of the Agenda 21 of the United Nations Conference of Environment and Development (UNCED). In addition, two spheres of interest specific to the Dutch situation have been added. The spheres of interest within the National Forum are:</p> <ul style="list-style-type: none"> - Forest owners and forest managers; - Chain of custody from harvest to consumer; - Non-timber users of the forest; - NGOs - Employer and employee organizations; - Science (research institutes and universities) - Certification bodies - Trees outside forest”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V complies with the PEFC requirement. The category of indigenous peoples is not relevant to the conditions of the Netherlands. In addition, it sets up two additional stakeholder groups.</p> <p>Observation</p> <p>The text of PCSN V implies that the stakeholders mapping and identification of stakeholder categories is explicitly linked to creation of the Forum. However, the objective of the stakeholder mapping as described in PEFC ST 1001:2017 is broader and relates to the whole stages of the standard setting, announcement of the start, setting of the Working Group, public consultation, etc.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			In addition, the added categories such as non-timber users or trees outside forests are difficult to define as other categories could also have interest in those categories. Finally, the category of “employer and employee interest” is not clearly defined and forest owners/managers or business/industry will most likely have conflicting interests than representatives of employees and trade unions.
	Process	YES	<p>PEFC Netherlands provided a document outlining the stakeholders mapping identifying relevant stakeholder categories, key issues, motives for participation, key stakeholders and means of communication for each of the following categories^[32]:</p> <ul style="list-style-type: none"> - Forest owners and forest managers; - Chain of custody from harvest to consumer; - Non-timber users of the forest; - NGOs - Employer and employee organizations; - Science (research institutes and universities) - Certification bodies - Trees outside forest <p>Also the stakeholders mapping table^[33] uses the predefined stakeholder categories.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders mapping complies with the PEFC requirement. The category of indigenous peoples is not relevant to the conditions of the Netherlands. In addition, it sets up two additional stakeholder groups.</p>
<p>6.2.3 The standardising body shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities.</p> <p>NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.</p>	Procedures	YES	<p>PCSN V</p> <p>6.2.3 “PEFC Netherlands shall identify important stakeholders and address the constraints that prevent their participation in the standard development process.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires to identify “important” stakeholders. However, PCSN V does not require to identify “disadvantaged” stakeholders.</p> <p>PEFC Netherlands provided argumentation that within conditions of the Netherlands there are no stakeholders that would be disadvantaged based on lack of resources, language, or other aspects. In addition, PEFC Netherlands provides compensation of the Forum’s members travel costs.</p> <p>Following the stakeholders’ and PEFC Netherlands’ interviews conducted as a part of the in-country visit, the assessor considers the PEFC Netherlands argumentation as justifiable.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<p>PEFC Netherlands provided a stakeholders mapping document identifying relevant stakeholder categories, including key stakeholders for each of the categories^[32]. As a part of the in-country visit the assessor reviewed a stakeholders mapping table with a list of identified stakeholders^[33].</p> <p>The stakeholders mapping table^[33] identified key stakeholders.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The stakeholders mapping identified key stakeholders.</p> <p>Concerning disadvantaged stakeholders that are not identified in the stakeholders mapping, PEFC Netherlands provided argumentation that within conditions of the Netherlands there are no stakeholders that would be disadvantaged based on lack of resources, language, or other aspects. In addition, PEFC Netherlands provides compensation of the Forum's members travel costs.</p> <p>Following the stakeholders' and PEFC Netherlands' interviews conducted as a part of the in-country visit, the assessor considers the PEFC Netherlands argumentation as justifiable.</p>
6.3.1 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation to stakeholders to participate in the process. The announcement shall be made in a timely manner through suitable media, as appropriate, to give stakeholders an opportunity for meaningful contributions.	Procedures	YES	<p>PCSN V</p> <p>6.3.1 "The Board of PEFC Netherlands shall announce via the PEFC Netherlands website, digital newsletter and email that it has convened the National PEFC Forum for the start of the drafting or revision of the Dutch PEFC standard. This will be announced at least four weeks before the first official meeting. The announcement shall include the following:..."</p> <p>Note 1: In a timely manner means (at the latest) four weeks before the first standard-setting activity is scheduled to occur".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires the public announcement to be done through the website, digital newsletter and email at least four weeks prior to the first meeting of the Forum.</p>
<p>NOTE 1 <i>In a timely manner</i> means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.</p> <p>NOTE 2 <i>Through suitable media</i> means at least through the standardising body's website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in</p>	Process	YES	<p>PEFC Netherlands announced the start of the revision process by:</p> <ul style="list-style-type: none"> a) A news at the PEFC Netherlands website (20/5/2019)^[13]; b) A direct letter to stakeholders (22/5/2019)^[34]. <p>In addition, some key stakeholders were also invited personally through face-to-face meetings.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement was published at the PEFC Netherlands website and Twitter. PEFC Netherlands also announced the start of the process by a direct mailing to all identified stakeholders (69 stakeholders). All communication took place more than four weeks prior to the first Forum meeting (27 June 2019).</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
trade-press, information sent to branch organisations, social media, digital media, etc.			
6.3.1 The announcement and invitation shall include:			
(a) overview of the standard-setting process,	Procedures	YES	<p>PCSN V</p> <p>6.3.1 “The Board of PEFC Netherlands shall announce via the PEFC Netherlands website, digital newsletter and email that it has convened the National PEFC Forum for the start of the drafting or revision of the Dutch PEFC standard. This will be announced at least four weeks before the first official meeting. The announcement shall include the following:</p> <p>a) An overview of the standard development process,...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V complies with the PEFC requirement.</p>
	Process	YES	<p>The public announcement at the PEFC Netherlands website is mainly focused on invitation of stakeholders to nominate representatives to the Forum. The link that should provide more information about the process leads back to the news itself^[13].</p> <p>PEFC Netherlands provided explanation that the link was made to www.pefcnederland.nl/forum that was then changed to www.pefc.nl/forum^[28]. The link included in an announcement/invitation letter^[34] included a link to www.pefcnederland.nl/forum that today redirects to www.pefc.nl/forum^[28]</p> <p>The website www.pefc.nl/forum^[28] includes information on the overview of the process.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The public announcement itself (news, letter, twitter) does not include overview of the revision process. The required information is included in a separate page of the PEFC Netherlands website www.pefc.nl/forum^[28].</p> <p>The non-working link at the website news^[13] was explained by technical failure that is caused by transition to the new website during the process.</p>
(b) access to the proposal for the standard (refer to 6.1),	Procedures	YES	<p>PCSN V</p> <p>6.3.1 “The Board of PEFC Netherlands shall announce via the PEFC Netherlands website, digital newsletter and email that it has</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>convened the National PEFC Forum for the start of the drafting or revision of the Dutch PEFC standard. This will be announced at least four weeks before the first official meeting. The announcement shall include the following...:</p> <p>b) Access to the draft proposal (see 6.1),”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V that the announcement shall provide an access to the “draft proposal”. Although the wording “draft proposal” is ambiguous, the reference to chapter PCSN V, 6.1 (Proposal for the creation of a standard) makes it clear that PCSN V requires to provide stakeholders with access to the “Standard Proposal”.</p>
	Process	YES	<p>The public announcement at the PEFC Netherland’s website^[13] and the announcement/invitation letter^[34] include a link to www.pefcnederland.nl/forum that redirects to www.pefc.nl/forum^[28]. Neither the announcement news^[13] nor the letter ^[34] nor the website www.pefc.nl/forum^[28] includes an access to the Standard Proposal.</p> <p>The Standard Proposal was included in an e-mail^[35] that was used to distribute the announcement/invitation letter^[34].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard Proposal was accessible through an email to all stakeholders. In addition, important parts that are required for the Standard Proposal for revision of the standards (PEFC ST 1001:2017, 6.1.2) are included in in revision dedicated website www.pefc.nl/forum^[28].</p>
(c) information about opportunities for stakeholders to participate in the process,	Procedures	YES	<p>PCSN V</p> <p>6.3.1 “The Board of PEFC Netherlands shall announce via the PEFC Netherlands website, digital newsletter and email that it has convened the National PEFC Forum for the start of the drafting or revision of the Dutch PEFC standard. This will be announced at least four weeks before the first official meeting. The announcement shall include the following...:</p> <p>c) Information on opportunities for stakeholders to participate in the process,...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>The public announcement at the PEFC Netherland’s website^[13] is mainly focused on invitation of stakeholders to nominate representatives to the Forum. In addition, it also includes an invitation of stakeholders to comment on the standard setting procedures.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: The public announcement published at the website provided information on opportunities to participate in the process.
(d) requests to stakeholders to nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand,	Procedures	YES	PCSN V 6.3.1 "The Board of PEFC Netherlands shall announce via the PEFC Netherlands website, digital newsletter and email that it has convened the National PEFC Forum for the start of the drafting or revision of the Dutch PEFC standard. This will be announced at least four weeks before the first official meeting. The announcement shall include the following...: d) Request to stakeholders to nominate their representatives or themselves (see 5.4). Specific attention is given to reaching out to important stakeholders in a way that they received the information in a way that is understandable...". Compliance: Conformity Justification: PCSN V requires to include a call for nominations in the announcement that satisfies the PEFC requirement that the communication shall reach the intended recipient and shall be understandable.
	Process	YES	PEFC Netherlands announced the start of the revision process / invitation by: a) A news at the PEFC Netherlands website (20/5/2019) ^[13] ; b) A direct letter to stakeholders (22/5/2019) ^[34] ; c) A post on PEFC Netherlands Twitter (23/5/2019) ^[24] . The public announcement was mainly focused on invitation of stakeholders to nominate representatives to the Forum. Compliance: Conformity Justification: The invitation was published at the PEFC Netherlands website and Twitter. PEFC Netherlands also communicated the invitation by a direct mailing to all identified stakeholders (69 stakeholders) that ensures that the information was received and understood.
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	YES	PCSN V 6.3.1 "The Board of PEFC Netherlands shall announce via the PEFC Netherlands website, digital newsletter and email that it has convened the National PEFC Forum for the start of the drafting or revision of the Dutch PEFC standard. This will be announced at least four weeks before the first official meeting. The announcement shall include the following...: e) Explicit invitation and clear instructions on how to provide feedback on the scope and the standard development process,...".

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	The public announcement at the PEFC Netherlands website ^[13] and in the letter ^[34] includes an explicit invitation to stakeholders to comment on the scope of the revision and standard setting process/procedures. Compliance: Conformity Justification: The announcement includes the invitation to comment.
(f) access to the standard-setting procedures.	Procedures	YES	PCSN V 6.3.1 "The Board of PEFC Netherlands shall announce via the PEFC Netherlands website, digital newsletter and email that it has convened the National PEFC Forum for the start of the drafting or revision of the Dutch PEFC standard. This will be announced at least four weeks before the first official meeting. The announcement shall include the following...: f) Access to the standard development procedures,...". Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	The public announcement at the PEFC Netherlands website is mainly focused on invitation of stakeholders to nominate representatives to the Forum. The link that should provide more information about the process leads back to the news itself ^[13] . PEFC Netherlands provided explanation that the link was made to www.pefcnederland.nl/forum that was then changed to www.pefc.nl/forum ^[28] . The link included in an announcement/invitation letter ^[34] included a link to www.pefcnederland.nl/forum that today redirects to www.pefc.nl/forum ^[28] . The website www.pefc.nl/forum ^[28] provides an access to the standard setting procedures (PCSN V). Compliance: Conformity Justification: The public announcement itself (news, letter, twitter) does not provide an access to the standard setting procedures. The required information is included in a separate page of the PEFC Netherlands website www.pefc.nl/forum ^[28] to which the announcement refers.
6.3.2 The standardising body shall review the standard-setting	Procedures	YES	PCSN V

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
process based on feedback received in response to the public announcement.			<p>6.3.2 PEFC Netherlands will assess the standard development process based on the feedback given from the public announcement.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PEFC Netherlands claims that it has received no comment as a result of the public announcement.</p> <p>PEFC Netherlands provided evidence on communication with the Dutch accreditation body (RvA)^[14]. The communication, invoked by PEFC Netherlands, indicated areas of requirements for certification bodies to which the revision should pay a special attention. In addition, it also discussed the assessment of the PCSN scheme by the accreditation body.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands claims that it had received no comments.</p>
6.4.1 The standardising body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for balanced representation of the working group, considerations of an appropriate gender balance, relevance of the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.	Procedures	YES	<p>PCSN V</p> <p>6.4.1 "The Board of PEFC Netherlands shall establish a National PEFC Forum in accordance with articles 18.1 and 18.2 of its constitution. The National PEFC Forum shall be convened for the preparation of the PEFC Standard Netherlands and for the periodic revision of this standard. Acceptance or rejection of nominations shall be justified on the basis of the requirements for balance of the Forum, consideration of appropriate gender balance, relevance of the organization, competencies, relevant experience and resources available for the standard development process. For the purpose of periodic revision of the standard, the Board shall convene the PEFC Forum no more than five years after the entry into force of the last revision."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement for creation of the Forum where acceptance/rejection of nominations shall be justified.</p>
	Process	YES	<p>Based on call for nominations^[13], the PEFC Netherlands BoD established the Forum by accepting all received nominations^[15]. In addition, the Board appointed a Chairman of the Forum.</p> <p>Following the nominations acceptance, two nominations have been withdrawn and one person did not respond to the confirmation.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>All received nominations were accepted.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
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	Procedures	YES	<p>PCSN V</p> <p>6.4.2 "The National Forum shall: a) have a balanced representation of the different spheres of interest and be constituted in such a way that none of the spheres of interest dominates the decision making".</p> <p>6.2.2 "...The spheres of interest within the National Forum are:</p> <ul style="list-style-type: none"> - Forest owners and forest managers; - Chain of custody from harvest to consumer; - Non-timber users of the forest; - NGOs - Employer and employee organizations; - Science (research institutes and universities) - Certification bodies - Trees outside forest" <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V require balanced representation of 7 stakeholder categories (spheres of interest) that are based on Agenda 21 stakeholder groups with modification of 3 categories (non-timber forest use, certification bodies and ToF.</p> <p>Observation</p> <p>The stakeholder categories are not exclusive and will result in overlap of interests. For example, for affiliation with the newly added categories such as non-timber users or trees outside forests, also other categories (forest owners, land owners, CoC, NGOs) could also have interest in joining those categories. Finally, the category of "employer and employee interest" is not clearly defined and forest owners/managers or business/industry will most likely have conflicting interests than representatives of employees and trade unions.</p>
	Process	YES	<p>The Forum consists of 15 persons plus Chairman with balance amongst the defined categories:</p> <ul style="list-style-type: none"> - Forest owners and forest managers (3); - Chain of custody from harvest to consumer (1); - Non-timber users of the forest (2); - NGOs (2) - Employer and employee organizations (2); - Science (1); - Certification bodies (2); - Trees outside forest (2).

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>The membership of the Forum is shown in Annex E.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Forum is well balanced with representation of all defined categories. The composition also reflects the scope of the revised/developed standards, including ToF</p>
(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.	Procedures	YES	<p>PCSN V</p> <p>6.4.2 "The National Forum shall:</p> <p>a) have a balanced representation of the different spheres of interest and be constituted in such a way that none of the spheres of interest dominates the decision making,</p> <p>b) include stakeholders with relevant expertise in relation to the subject matter of the standard. Enough relevant stakeholders will participate".</p> <p>6.4.3 "In order to achieve balance PEFC Netherlands shall strive to have all identified spheres of interest participate in the Forum. PEFC Netherlands will proactively seek their participation for example through in person meetings or personal emails".</p> <p>6.2.2 "...The spheres of interest within the National Forum are:</p> <ul style="list-style-type: none"> - Forest owners and forest managers; - Chain of custody from harvest to consumer; - Non-timber users of the forest; - NGOs - Employer and employee organizations; - Science (research institutes and universities) - Certification bodies - Trees outside forest" <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V defines that members of the Forum shall have sufficient expertise.</p> <p>PCSN also requires that all stakeholder categories shall be represented and stakeholders "that can influence the implementation of the standard" and "are affected by the standard" are represented by 5 out of 8 categories. This ensures that those stakeholders will have appropriate proportion amongst participants.</p>
	Process	YES	<p>All members of the Forum have expertise and knowledge in their respective field.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>11 members can influence the implementation or are directly affected by the standard (forest owners, ToF, non-timber forest products, certification bodies, employees).</p> <p>7 members are directly affected by the Standard (forest owners, ToF, employees).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>All members of the Forum have expertise and knowledge in their respective field.</p> <p>The stakeholders that can influence the implementation and those that are affected by the implementation of the standard (forest owners, ToF, non-timber forest products, certification bodies, employees) are well represented (11 out of 15).</p> <p>Those stakeholders that are affected by the standard (forest owners, ToF, employees) represent an appropriate proportion (7 out of 15).</p>
<p>6.4.3 In order to achieve balanced representation, the standardising body shall strive to have all identified stakeholder groups (refer to 6.2) represented. The standardising body shall set targets for the participation of key stakeholders and proactively seek their participation by using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.</p> <p>NOTE When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardising body may consider alternative options.</p>	Procedures	YES	<p>PCSN V</p> <p>6.4.3 "In order to achieve balance PEFC Netherlands shall strive to have all identified spheres of interest participate in the Forum. PEFC Netherlands will proactively seek their participation for example through in person meetings or personal emails".</p> <p>Note: When a sphere of interest does not participate and important stakeholders cannot be convinced to participate PEFC Netherlands will assess whether the Forum can still go ahead.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The procedures require that all identified stakeholder categories should be represented in the Forum and defines proactive measures to ensure their representation.</p>
	Process	YES	<p>The Forum consists of 16 members and all predefined stakeholder categories are represented. One stakeholders category (forest owners has 3 members), two stakeholder categories have (Science, CoC) have 1 member each and the remaining categories (5) have two members each.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Forum includes representation for all envisaged stakeholder categories.</p>
6.4.4 Activities of the working group shall be organised in an open and transparent manner where:			
(a) working drafts shall be available to all members of the working group,	Procedures	YES	<p>PCSN V</p> <p>6.4.4 "Activities of the Forum will be organized in an open and transparent manner whereby: a) draft documents will be made accessible to all members of the Forum".</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	During the standard setting / revision process, the Forum met 8 times. After the introductory meeting held on 27 June 2019, the Forum met on (all in person meetings): <ul style="list-style-type: none"> - 24 September 2019^[1], - 29 October 2019^[2], - 20 November 2020^[3], - 17 December 2019^[4], - 21 January 2020^[5], - 20 February 2020^[6], - 9 October 2020^[7]. For all those meeting, the PEFC Netherlands' secretariat distributed a written invitation (e-mail) ^[16-23] that included an agenda, draft standard or their parts, and other supporting documentation). Compliance: Conformity Justification: Prior to meetings, the members of the Forum received a written invitation (e-mail) to the meetings with an agenda and latest drafts of the standard.
(b) all members of the working group shall be given meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on working drafts, and	Procedures	YES	PCSN V 6.4.4 "Activities of the Forum will be organized in an open and transparent manner whereby: all Forum members are given sufficient opportunities to contribute to the development or revision of the standard and to provide feedback on draft documents; and". Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	The Forum met 7 times in in-person meetings (see also 6.4.4a) that took 4-5 hours. The minutes of the meetings ^[1-7] show that the Forum discussed all elements of the standard with general intention to achieve a consensus amongst stakeholders. <ul style="list-style-type: none"> - The Forum met 7 times during the period between September 2019 and October 2020. - The meetings were well organised with clearly written and communicated agenda for each meeting. - The meetings were well attended by members of the Forum. - The meetings provided sufficient time for discussion. Compliance: Conformity Justification:

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The Working Group meetings were well organized and provided members with opportunities for meaningful contributions. The Forum was supported by the PEFC Netherlands Secretariat that were responsible for preparing draft documents based on outcomes of the meetings.
(c) feedback and views given by any member of the working group shall be considered in an open and transparent way where the outcome of these considerations is recorded.	Procedures	YES	<p>PCSN V</p> <p>6.4.4 “Activities of the Forum will be organized in an open and transparent manner whereby: all Forum members are given sufficient opportunities to contribute to the development or revision of the standard and to provide feedback on draft documents; and”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>The minutes of the Forum meetings^[1-7] provide evidence of the openness and consideration of comments raised by the Forum's members.</p> <p>The minutes of the meetings have been kept and distributed to the Working Group members as a part of the invitation to the next meeting^[17-23]. The agenda for each meeting also included approval of minutes from the last meeting^[1-7].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Working Group meetings were well organized, their results were recorded and communicated to the members of the Forum.</p>
6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. In order to determine whether there is any sustained opposition, the working group can utilise the following methods:			
(a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,	Procedures	YES	<p>PCSN V</p> <p>6.4.5 “Decision making in the Forum shall be based on achieving consensus as referred to in PEFC ST 1001:2017, article 6.4.5. The Forum may use the following methods for this purpose:</p> <p>- face-to-face meetings where there is a verbal yes/no vote; the hand is raised for a yes/no vote; a statement that there is consensus where the Chair sees no dissenting voices or hands; a formal paper vote, etc.,”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Forum's decision was made through combination of methods (see 6.4.5d).</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	YES	<p>PCSN V</p> <p>6.4.5 "Decision making in the Forum shall be based on achieving consensus as referred to in PEFC ST 1001:2017, article 6.4.5. The Forum may use the following methods for this purpose:...</p> <ul style="list-style-type: none"> - telephone or digital conferences where there is a verbal yes/no vote,". <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Forum's decision was made through combination of methods (see 6.4.5d).</p>
(c) e-mail request to the working group for agreement or objection where the members provide a formal (written) response (vote),	Procedures	YES	<p>PCSN V</p> <p>6.4.5 "Decision making in the Forum shall be based on achieving consensus as referred to in PEFC ST 1001:2017, article 6.4.5. The Forum may use the following methods for this purpose:...</p> <ul style="list-style-type: none"> - e-mail request to the Forum for consent or objection where participants provide a formal (written) response (vote), or". <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Forum's decision was made through combination of methods (see 6.4.5d).</p>
(d) combinations of these methods.	Procedures	YES	<p>PCSN V</p> <p>6.4.5 "Decision making in the Forum shall be based on achieving consensus as referred to in PEFC ST 1001:2017, article 6.4.5. The Forum may use the following methods for this purpose:...</p> <ul style="list-style-type: none"> - combinations of these methods". <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	YES	<p>The Forum unilaterally accepted the final wording of the Standard (PCSN I) at its meeting held on 9 October 2020^[7], except for three criteria that were decided to be sent out to members of the Forum for the postal ballot.</p> <p>The conditions of the postal ballot^[9] (19/10/2020) indicated that no response to the postal ballot (23/10/2020) would mean</p>

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			acceptance of the standard. The postal ballot accepted the three remaining criteria. Compliance: Conformity Justification: The Forum's decision was made through combination of voting at the face-to face meeting and a postal ballot (see 6.4.5d).
6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.	Procedures	YES	PCSN V 6.4.6 "When voting is used as a decision-making mechanism, four of the eight votes from the spheres of interest are sufficient provided there is no well-founded opposition". Compliance: Conformity Justification: PCSN V defines voting to approve the standard with a majority vote in favor of four (out of eight – 50 %) of the stakeholder categories. Any sustained opposition (well-founded opposition) shall be resolved by means specified in PCSN V, 6.4.7.
	Process	YES	The Forum only used voting to identify if there is opposition to the final draft standard ^[9] (Appendix 12 to the Development Report).
6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:			
(a) finding a compromise through discussion and negotiation on the disputed issue within the working group,	Procedures	YES	PCSN V 6.4.7 "When there is well-founded opposition on an important issue, the following methods will be used to try to resolve the issue: a) find a compromise through discussion and negotiation within the Forum...". Compliance: Conformity Justification: PCSN V satisfies the requirement.
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
(b) finding a compromise through direct negotiation between the stakeholder(s) making the objection and other stakeholders with different views on the disputed issue,	Procedures	YES	PCSN V 6.4.7 "When there is well-founded opposition on an important issue, the following methods will be used to try to resolve the issue:... b) finding a compromise through direct negotiation among participants with differing views...". Compliance: Conformity Justification: PCSN V satisfies the requirement.

PEFC benchmark requirement	Assess. basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
(c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardising body determines the scope and duration of any additional public consultation.	Procedures	YES	<p>PCSN V</p> <p>6.4.7 “When there is well-founded opposition on an important issue, the following methods will be used to try to resolve the issue:...</p> <p>c) additional rounds of public consultation (where necessary) more input from stakeholders which can help to reach consensus. The standardizing organization determines the scope and duration of the additional public consultation”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
6.4.8 When a substantial issue cannot be resolved and sustained opposition persists, the standardising body shall initiate dispute resolution in accordance with its procedures for impartial and objective action.	Procedures	YES	<p>PCSN V</p> <p>6.4.8 “If consensus cannot be reached on a particular proposal, the issue will be brought to the college of appeal of PEFC Netherlands. The outcome presented by the college of appeal is a binding solution”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V makes reference to the college of appeal of PEFC Netherlands (see also PFCN VII) that defines an impartial body outside PEFC Netherlands and impartial investigation of any appeal. The outcomes of the college of appeals is binding for the Forum.</p>
	Process	N/A	The final draft standard was unanimously recommended for formal approval.
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that:			
(a) the start and the end dates of public consultation are announced in a timely manner through suitable media, NOTE <i>In a timely manner</i> means (at the latest) the day before the start of public consultation.	Procedures	YES	<p>PCSN V</p> <p>6.5.1 “PEFC Netherlands shall organise a public consultation on the final draft version of the standard ensuring that:</p> <p>a) The start and end date of the public consultation will be communicated at least one day before the start of the public consultation via the newsletter and website of PEFC Netherlands,...”</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			PCSN V satisfies the PEFC requirement.
	Process	YES	<p>The announcement of the public consultation has been announced by the following means:</p> <ul style="list-style-type: none"> a) at the PEFC Netherlands website on 12 March 2020^[24], b) at the PEFC Netherlands Twitter on 25 March 2020^[25], c) at the forest owners associations' website on 16 March 2020^[25], d) Video at the Youtube channel introducing the revision process and public consultation <p>The public consultation lasted from 12 March until 26 April 2020^[24] and was supported by a dedicated website allowing to read the draft standard and to make comments directly to a specific chapter of the standard^[26].</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The announcement was published at the applicant's website and other media and included both the start and the end date of the public consultation.</p> <p>The announcement was published on the same date as the start of the consultation and meets the PEFC interpretation of the term in "timely manner".</p>
(b) a direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping (refer to 6.2) aiming for a balanced participation of stakeholder groups,	Procedures	YES	<p>PCSN V</p> <p>6.5.1 "PEFC Netherlands shall organise a public consultation on the final draft version of the standard ensuring that:...</p> <p>b) The stakeholders identified in 6.2 will be individually approached to comment on the final draft version of the standard..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PEFC Netherlands has provided an email^[36] distributed to all stakeholders identified in the stakeholders mapping.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands invited all identified stakeholders by an e-mail.</p>
(c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,	Procedures	YES	<p>PCSN V</p> <p>6.5.1 "PEFC Netherlands shall organise a public consultation on the final draft version of the standard ensuring that:</p> <p>b) The stakeholders identified in 6.2 will be individually approached to comment on the final draft version of the standard..."</p> <p>c) Important stakeholders will be taken into account..."</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: PCSN V does not have an explicit requirement for invitation of the key and disadvantaged stakeholders. However 6.5.1 that requires the direct invitation to all identified stakeholders would satisfy the PEFC requirement.
	Process	YES	PEFC Netherlands has provided an email ^[36] distributed to all stakeholders identified in the stakeholders mapping. The content of the e-mail was understandable. Compliance: Conformity Justification: PEFC Netherlands invited all identified stakeholders by an e-mail.
(d) the enquiry draft is made publicly available,	Procedures	YES	PCSN V 6.5.1 "PEFC Netherlands shall organise a public consultation on the final draft version of the standard ensuring that...: d) The final draft version will be made publicly available,..." Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	The public announcement of the public consultation at the PEFC Netherlands' website ^[24] provided a link to the dedicated public consultation website ^[27] that included the text of the enquiry draft as well as to the website of the Forum that included a draft standard to be downloaded ^[28] . Compliance: Conformity Justification: The enquiry draft was publicly available.
(e) public consultation is for at least 60 days,	Procedures	YES	PCSN V 6.5.1 "PEFC Netherlands shall organise a public consultation on the final draft version of the standard ensuring that...: e) The public consultation lasts at least 60 days,..." Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	NO	The public announcement of the public consultation at the applicant's website ^[24] indicated that the public consultation lasted from 12 March 2020 until 26 April 2020 (45 days). Compliance: Minor non-conformity Justification:

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>The public consultation lasted 45 instead of required 60 days.</p> <p>It should be noted that the public consultation website^[24] remained open after long after the official public consultation deadline.</p> <p>In addition, PEFC Netherlands received comments from a single stakeholder (Wageningen University) after the formal end of the public consultation. The comments were still accepted and considered by the Forum at its September meeting^[7].</p>
(f) all feedback is considered by the working group in an objective manner, and	Procedures	YES	<p>PCSN V</p> <p>6.5.1 "PEFC Netherlands shall organise a public consultation on the final draft version of the standard ensuring that:</p> <p>f) All comments will be dealt with objectively by the Forum,..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PEFC Netherlands claims that it had not received any comment during the public consultation period^[8]. However, the minutes of the last meeting of the Forum (9 October 2020) indicated that it received a draft document with comments from public consultation to be marked in green colour^[7].</p> <p>These comments from Wageningen University were received after the formal end of the public consultation from Wageningen University and were considered by the Forum in an objective manner.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Forum considered comments from a single stakeholder in an objective manner.</p>
(g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.	Procedures	YES	<p>PCSN V</p> <p>6.5.1 "PEFC Netherlands shall organise a public consultation on the final draft version of the standard ensuring that...:</p> <p>g) The Forum publishes the responses and changes to the standard and sends them to the submitters."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>The only comments from Wageningen University were received after the formal end of the public consultation from Wageningen University and were considered by the Forum in an objective manner.</p> <p>The comments were incorporated into the next draft that was published at the PEFC Netherlands' website^[12] and a personal response was sent to the directly to the Wageningen University that made the comments by an e-mail of 9 October 2020^[38].</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
original feedback and the response, to allow each stakeholder to identify its own feedback.			Compliance: Conformity Justification: The result of comments consideration were made publicly available by publishing a new standard and direct communication was conducted to the only stakeholder that provided comments.
6.5.2 For new standards the standardising body shall organise a second round of public consultation lasting at least 30 days.	Procedures	YES	PCSN V 6.5.2 “For a new standard, the standardizing organization will hold a second round of public consultation lasting at least 30 days”. Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	Compliance: Not applicable Justification: PEFC Netherlands has not conducted the second public consultation as it has revised an existing standard.
6.6 The standardising body shall organise pilot testing of new standard(s) to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing. NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.	Procedures	YES	PCSN V 6.6 “Before submitting a new standard to the PEFC Council for approval, a pilot test will be conducted. The results will be documented and if necessary used to improve the standard. This is not required for a revision of a standard”. Compliance: Conformity Justification: PCSN V requires a pilot testing of a new standard.
	Process	YES	PEFC Netherlands commissioned a pilot testing for both the new criteria of the existing forest management standard ^[30] as well as for the ToF requirements (standard) ^[29] . It should be noted that PEFC ST 1001:2017 requires the pilot testing only for a new standard, i.e. the PEFC requirement is not mandatory for the revision of the PCSN scheme. The pilot testing has been carried out on Landgoed Twickel estate that covers both forest land as well as agriculture land with tree cover (ToF). The pilot testing has been carried out by the certification body's auditor and the PEFC Netherlands' secretariat. The pilot testing resulted in two studies ^[29,30] , one relevant for the ToF ^[30] and the second for new criteria of the forest management standard ^[29] . Compliance: Conformity Justification: The pilot testing took place and was conducted by personnel with sufficient qualification and competences.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
Approval and Publication			
7.1 The standardising body shall approve the standard(s)/normative document(s) formally when there is evidence of consensus among the working group.	Procedures	YES	<p>PCSN V</p> <p>7.1 “Formal approval of standards The final draft standard shall be submitted for endorsement to the general assembly of PEFC Netherlands if there is consensus”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PCSN I was approved by the PEFC Netherlands General Assembly on 5 November 2020.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard was formally approved.</p>
7.2.1 The formally approved standard(s)/normative document(s) shall be published and made publicly available at no cost within 14 days of approval, or as otherwise defined by the standardising body.	Procedures	YES	<p>PCSN V</p> <p>7.2.1 The formally approved standard(s) shall be published and made publicly available free of charge within 14 days of its formal approval.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PEFC Netherlands published a news at its website on formal approval of the revised scheme (26 November 2020)^[31]. However, the announcement does not include a link to the newly approved standard(s).</p> <p>The newly approved standards have been published at the website that has been dedicated to the revision of the scheme^[28].</p> <p>The published standard (PCSN I) includes publication date of 26 October 2020.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The formally approved standard was published on 26/11/2020, 21 days after its formal approval. Although there is 7 days delays from the deadline that is set up 1001:2017 as well as PFCS V, this was not classified as non-conformity as the standard cannot be used until it is re-endorsed by the PEFC Council.</p>
7.2.2 Standard(s) shall include:			

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) identification and contact information for the standardising body,	Procedures	YES	<p>PCSN V</p> <p>7.2.2 “The standard(s) will include the following:</p> <p>a) Identification and contact information of PEFC Netherlands...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PCSN I includes identification of the standardising body's website (www.pefc.nl) and provides contact email info@pefc.nl.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The identification of the standardisation body is only indirect through the PEFC Netherlands website displayed at the standard.</p>
(b) official language of the standard,	Procedures	YES	<p>PCSN V</p> <p>7.2.2 “The standard(s) will include the following...:</p> <p>b) Official language of the standard...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires the standard to identify the official language of the standard.</p>
	Process	YES	<p>PCSN I</p> <p>“The English version of the PEFC Certification System Netherlands (PCSN) is the only valid version. Translations can be used but only for information purposes”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I specifies English as the official language of the Standard.</p>
(c) a note that when there is inconsistency between versions, the English version of the standard as endorsed by the PEFC Council is the reference.	Procedures	YES	<p>PCSN V</p> <p>7.2.2 “The standard(s) will include the following:...:</p> <p>c) A note that where inconsistencies exist between different versions, the English of the standard shall always be the authoritative version because it has been approved by the PEFC Council...</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PCSN I</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>"The English version of the PEFC Certification System Netherlands (PCSN) is the only valid version. Translations can be used but only for information purposes".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I considers English as the official and decisive language version of the standard.</p>
<p>(d) The approval date and the date of next periodic review</p> <p>NOTE The date of next periodic review may be within a shorter period than five years based on (for example) stakeholder expectations or other unforeseen developments.</p>	Procedures	YES	<p>PCSN V</p> <p>7.2.2 "The standard(s) will include the following:...</p> <p>d) The date of approval and the date of the next periodic review</p> <p>Note: The date of the next periodic review may be earlier than five years, based on e.g. stakeholder expectations or other unforeseen developments".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>PCSN I includes an issue date of 5 November 2020 and a review date of 5 November 2025.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN has been formally approved on 5 November 2020 and published on 26 November 2020. The approval date is used as the "issue date" that is displayed on the standard.</p> <p>Observation</p> <p>PEFC Netherlands amended the standard (PCSN I) during the revision process. However, this event is not reflected in the issue date.</p>
<p>7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any)</p>	Procedures	YES	<p>PCSN V</p> <p>7.2.3 "Printed versions will be made available upon request. The price of the printed versions will not exceed the cost of printing".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	YES	<p>The assessor has not received any information that would indicate that the applicant has rejected to provide a printed copy of the forest management standard.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The applicant satisfies the requirement.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	YES	<p>PCSN V</p> <p>7.2.4 “PEFC Netherlands shall make a development report and publish it on its website”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires the development report to be prepared and published.</p>
	Process	YES	PEFC Netherlands published the Development report at its website ^[28] .
Periodic review of standards			
8.1 The standard(s)/normative document(s) shall be reviewed at intervals that do not exceed a five-year period. The review shall be based on consideration of feedback received during the standard's implementation and a gap analysis. If necessary, a stakeholder consultation shall be organised to obtain further feedback and input.	Procedures	YES	<p>PCSN V</p> <p>8.1 “The standard(s) will be assessed at least once every five years. The assessment will be based on feedback obtained during the implementation of the standard and the gap analysis. If necessary, a stakeholder consultation can be organized to obtain more feedback and input.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>
	Process	YES	<p>PEFC Netherlands approved the previous version of the standard in 2010 with PEFC endorsement in 2011. This would mean that the standard should. However, the delay has been approved by the PEFC Council as the new PEFC benchmark (PEFC ST 1003:2018) was at that time under development.</p> <p>PCSN I states that the next period review will start on 26 October 2025, i.e. five years after its formal approval.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The delay in revision (2019-2020) was approved by the PEFC Council. The future revision follows the five-years cycle.</p>
8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardising body and/or PEFC National Governing Body with	Procedures	YES	<p>8.2.1 “PEFC Netherlands shall develop and maintain a permanent mechanism for recording feedback on a standard. This mechanism shall be made accessible on the website of PEFC Netherlands with clear instructions on how to provide feedback”.</p> <p>Note: Feedback can be sent in various formats: suggestions, comments, proposals, requests for clarification and / or interpretation, complaints, etc.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the requirement.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
clear directions for providing feedback. NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.	Process	YES	PEFC Netherlands website includes an invitation of stakeholders to provide their comments and queries on the existing standard ^[33] . Compliance: Conformity Justification: PEFC Netherlands' website allows a mechanism for submitting comments.
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	YES	PCSN V 8.2.2 "All feedback received through all channels including meetings, trainings etc. will be noted." Compliance: Conformity Justification: PCSN V satisfies the requirement.
	Process	YES	PEFC Netherlands has not received comments / feedback on the standard except comments from the Dutch Accreditation Body ^[14] . The RVA's comments were both recorded and considered. Compliance: Conformity Justification: PEFC Netherlands has recorded and considered comments / feedback from stakeholders.
8.3.1 At the start of a review, the standardising body shall evaluate the standard against appropriate PEFC International standards, national laws and regulations, and other relevant standards to identify potential gaps in the standard.	Procedures	YES	PCSN V 8.3.1 "At the beginning of the assessment PEFC Netherlands shall evaluate the standard against the then valid standard of PEFC International, national laws and regulations and other relevant information that identifies potential gaps." Compliance: Conformity Justification: PCSN V requires the GAP analysis.
	Process	YES	PEFC Netherlands submitted a GAP analysis ^[10] that was considered by the PEFC Netherlands Board and based on it decided to launch a formal revision of the standard (March 2019). Compliance: Conformity Justification: PEFC Netherlands conducted a GAP analysis.
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	YES	PCSN V 8.3.2 "8.3.2 PEFC Netherlands shall include the latest scientific knowledge, research and emerging issues in the gap analysis". Compliance: Conformity Justification:

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			PCSN V satisfies the PEFC requirement.
	Process	YES	<p>PEFC Netherlands claims that it considered during the GAP analysis the latest scientific knowledge.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PEFC Netherlands conducted a GAP analysis.</p>
8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardising body shall organise stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardising body shall include the gap analysis in the stakeholder consultation.	Procedures	YES	<p>PCSN V</p> <p>8.4.1 "If the feedback and the gap analysis indicate that there is no need to revise the standard, PEFC Netherlands will organize a stakeholder consultation to determine whether stakeholders see a need to revise. PEFC Netherlands will add the gap analysis in the stakeholder consultation".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V requires to carry out public consultation where the gap analysis do not identify the need for revision.</p>
	Process	N/A	PEFC Netherlands decided to launch a formal revision process.
8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).	Procedures	YES	<p>PCSN V</p> <p>8.4.2 "At the beginning of the review PEFC Netherlands shall update its data of identified stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	N/A	PEFC Netherlands decided to launch a formal revision process.
8.4.3 The standardising body shall organise:			
(a) a public consultation period of at least 30 days (following the requirements of clause 6.5.1) and/or,	Procedures	YES	<p>PCSN V</p> <p>8.4.3 "PEFC Netherlands will organize the following:</p> <ul style="list-style-type: none"> - A public consultation period of at least 30 days (according to the requirements of clause 6.5.1) and/or - Stakeholder meetings". <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	N/A	PEFC Netherlands decided to launch a formal revision process.
(b) stakeholder meetings.	Procedures	YES	<p>PCSN V</p> <p>8.4.3 “PEFC Netherlands will organize the following:</p> <ul style="list-style-type: none"> - A public consultation period of at least 30 days (according to the requirements of clause 6.5.1) and/or - Stakeholder meetings”. <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	N/A	PEFC Netherlands decided to launch a formal revision process.
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	YES	<p>PCSN V</p> <p>8.4.4 “PEFC Netherlands shall announce the assessment four weeks before the first information meeting”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	N/A	PEFC Netherlands decided to launch a formal revision process.
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.	Procedures	YES	<p>PCSN V</p> <p>8.5.1 “PEFC Netherlands shall, based on the feedback data during the implementation of the standard, the outcome of the gap analysis and the consultations, decide whether to reaffirm the standard or whether the standard should be revised”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	YES	<p>Compliance: Conformity</p> <p>Justification:</p> <p>In March 2019, the PEFC Netherlands Board of Directors decided to launch a formal revision process of the PCSN standard.</p>
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	YES	<p>PCSN V</p> <p>8.5.2 “This decision will be taken by the board of PEFC Netherlands.”</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			The decision is to be taken by the Board. Although the Board is not the highest decision -making body of PEFC Netherlands, it is well placed to make such a decision.
	Process	YES	Compliance: Conformity Justification: In March 2019, the PEFC Netherlands Board of Directors decided to launch a formal revision process of the PCSN standard.
8.5.3 Where the decision is to reaffirm a standard, the standardising body shall provide a justification for the decision and make the justification publicly available.	Procedures	YES	PCSN V 8.5.3 "If the decision is taken to reaffirm the standard, PEFC Netherlands shall explain the decision and make the explanation publicly available." Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	PEFC Netherlands decided to launch a periodic revision of the standard.
8.5.4 Where the decision is to revise the standard, the standardising body shall specify the type of revision (normal or editorial revision).	Procedures	YES	PCSN V 8.5.4 "When it is decided to revise the standard, PEFC Netherlands shall clarify what kind of revision will take place (normal or administrative)." Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	PEFC Netherlands decided to launch a periodic revision of the standard.
Revision of standards			
9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6. A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.	Procedures	YES	PCSN V 9.1 "Normal revision After a periodic review it may be decided to initiate a normal review. During normal review, the procedures according to chapter six are followed". Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement. Observation PCSN V makes an inconsistent use of the term review and revision. Following PEFC ST 1001:2017 and ISO Directive 2, the review process focuses on whether a standard continues to be fit

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			for purpose while the revision process focuses on introducing changes into an existing standard. PEFC Netherlands correctly uses the term review in chapter 8 but then uses the term “review” inconsistently in chapter 9 that focuses on revision.
	Process	YES	PEFC Netherlands launched a periodic “normal” revision. The evaluation of compliance is included above.
9.2 Editorial revisions can be made without triggering the normal revision process. The standardising body shall approve the editorial changes formally and publish an amendment or a new edition of the standard.	Procedures	YES	PCSN V 9.2 “Administrative Review Administrative reviews can be carried out without starting the normal review process. PEFC Netherlands will formally approve the administrative changes and publish an amendment or new edition of the standard.” Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	PEFC Netherlands launched a periodic “normal” revision.
9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.	Procedures	YES	PCSN V 9.3.1 “A time-critical revision is a revision between two periodic reviews in which a timely decision is required.” Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	PEFC Netherlands launched a periodic “normal” revision.
9.3.2 A time-critical revision can be conducted only in the following situations:			
(a) Change in national laws and regulations affecting compliance with PEFC International requirements	Procedures	YES	PCSN V 9.3.2 A time-critical revision can only be initiated in the following cases: a) There is a change in national laws and regulations that affect compliance with the requirements of PEFC International...” Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	PEFC Netherlands launched a periodic “normal” revision.

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
(b) Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision.	Procedures	YES	<p>PCSN V</p> <p>9.3.2 A time-critical revision can only be initiated in the following cases:...</p> <p>b) PEFC Netherlands receives instructions from PEFC International to comply with a specific or new PEFC requirement within a specified time which is too short for a normal review."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	N/A	PEFC Netherlands launched a periodic "normal" revision.
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	YES	<p>PCSN V</p> <p>9.3.3 "The time-critical revision shall consist of the following steps:</p> <p>a) PEFC Netherlands shall draft the revised standard,..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	N/A	PEFC Netherlands launched a periodic "normal" revision.
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	YES	<p>PCSN V</p> <p>9.3.3 "The time-critical revision shall consist of the following steps:...</p> <p>b) PEFC Netherlands may consult stakeholders, but this is not mandatory,..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN V satisfies the PEFC requirement.</p>
	Process	N/A	PEFC Netherlands launched a periodic "normal" revision.
(c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardising body,	Procedures	YES	<p>PCSN V</p> <p>9.3.3 "The time-critical revision shall consist of the following steps:...</p> <p>c) The revised standard will be formally approved by the board of PEFC Netherlands,..."</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	PEFC Netherlands launched a periodic “normal” revision.
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	YES	PCSN V 9.3.3 “The time-critical revision shall consist of the following steps:...” d) PEFC Netherlands shall explain the justification for the urgent change and make this explanation publicly available.” Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	N/A	PEFC Netherlands launched a periodic “normal” revision.
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	YES	PCSN V 9.4.1 “PEFC Netherlands shall determine the application date for the international endorsement of PEFC International and the transition period of the revised standard.” Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	PCSN I “ Application date: 05-11-2021 Transition date: 05-11-2022” Compliance: Conformity Justification: PCSN I includes both, the application as well as transition dates.
9.4.2 An application date shall not be more than one year after the publication of the standard. This allows time for endorsement of the revised standard(s)/normative document(s), introduction of change(s), information dissemination and training.	Procedures	YES	PCSN V 9.4.2 “The application date shall be no later than 1 year after publication of the standard.” Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	PCSN I “ Application date: 05-11-2021 Transition date: 05-11-2022”

PEFC benchmark requirement	Assessment basis	YES /NO	Reference to system documentation (including quotation of relevant text)
			Compliance: Conformity Justification: The application date (5/11/2021) is set one year from the issue date (5/11/2020).
9.4.3 The transition period shall not exceed one year. The standardising body may determine a longer period when justified by exceptional circumstances.	Procedures	YES	PCSN V 9.4.3 "The transition period shall not exceed one year. PEFC Netherlands may extend that period should unexpected situations arise." Compliance: Conformity Justification: PCSN V satisfies the PEFC requirement.
	Process	YES	PCSN I "Application date: 05-11-2021 Transition date: 05-11-2022" Compliance: Conformity Justification: The transition date (5/11/2022) is set one year from the application date (5/11/2021).

Annex B: Detailed assessment of the group certification model

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
4. Context of the group organisation		
4.1 Understanding the group organisation and its context		
The standard shall define how relevant external and internal issues of the group organisation shall be determined. A general framework for the group organisation shall be determined:		
a) regional groups: group of forest owners/managers defined by regional borders and	N/A	Compliance: Not applicable Justification: PCSN II does not define requirements for regional groups.
b) other groups and/or	YES	PCSN II: 4.1 "Group certification is the certification of multiple owners and/or managers under a single group certificate. The group certificate is applied for and managed by a group manager. The group is not bound to a region within the Netherlands". Compliance: Conformity Justification: Chapter 4.1 used together with definitions provide description of the context and organisational structure of the defined group certification.
c) whether there are any other specific circumstances which influence the implementation of the group management system.	YES	Chapter Introduction describes general aspects for small scale forestry in the Netherlands that provide justification for the group certification. Compliance: Conformity Justification: The specific circumstances of the Dutch forestry is described in chapter Introduction.
4.2 Understanding the needs and expectations of affected stakeholders		
4.2.1 The standard requires that the group organisation shall identify:		
a) the affected stakeholders that are relevant for the group management system and	YES	PCSN II: 4.2.1 "The group organisation shall identify: a) Who the relevant stakeholders are for the group management system..." Compliance: Conformity Justification: Chapter 4.2.1 requires to identify affected stakeholders.
b) the relevant expectations of these affected stakeholders.	YES	PCSN II: 4.2.1 "The group organisation shall identify:..." b) What the relevant expectations are of the stakeholders involved" Compliance: Conformity Justification: Chapter 4.2.1 requires to relevant expectations of affected stakeholders.
4.3 Determining the scope of the group management system		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
4.3.1 The standard shall provide definitions relating to the following terms, which are in conformity with the definitions of those terms presented in chapter 3:		
a) the group organisation and the elements of the group organisation (group entity and participant),	YES	<p>PCSN II</p> <p>“3.8 Group Manager</p> <p>A legal entity that represents the participants and has ultimate responsibility for the correct implementation and execution in the certified area according to PCSN I. To achieve this, the group manager uses a group management system.”.</p> <p>“3.7 Group organisation</p> <p>A group of participants represented by the group manager for the implementation PCSN I. A legally binding document has been established between the participant and the group manager”</p> <p>“3.16 Participant</p> <p>An owner/manager who falls within the group certificate and meets the requirements of PCSN I”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definitions are compatible with those defined in PEFC ST 1002:2018.</p>
b) the certified area,	YES	<p>PCSN II</p> <p>“3.3 Certified area</p> <p>A forest and/or trees outside the forest area whose management is certified according to the Dutch PEFC standard.</p> <p>In the context of group certification, the certified area is the sum of the forest/tree areas of all participants that are part of the group certificate for forest/tree management.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definition is compatible with the one defined in PEFC ST 1002:2018.</p>
c) the group certificate and	YES	<p>PCSN II</p> <p>“3.5 Group certificate for forest and tree management</p> <p>A document confirming that the group organisation meets the requirements of PCSN I.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The definition is compatible with the one defined in PEFC ST 1002:2018.</p>
d) the document confirming participation in group certification.	YES	<p>PCSN II does not define relevant definition.</p> <p>PCSN II: “5.1.3.3 The group manager shall provide proof of participation to each individual owner/manager who has signed the agreement. The proof of participation shall include at least the following elements:</p> <ul style="list-style-type: none"> - name of the owner

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> - area and location of the (forest) area(s) under certified management - a participation number in the group certificate - name, address and signature of the group manager - the PEFC logo of the group manager - reference to the group certificate with the name of the certifying body - the period of validity of the group certificate - a list of all participants. <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN II does not define a definition of the term "Confirmation". However, clause 5.1.3.3 provides detailed description that is complying with the definition in PEFC ST 1002:2018.</p> <p>Observation:</p> <p>The fact that the "proof of participation" that is given to individual participants includes a list of all participants can bring the following challenges:</p> <ul style="list-style-type: none"> a) the group managers needs to bring this element in compliance with GDPR and b) the group manager needs to ensure that the list is actual when a new member enters the group.
4.3.2 The standard requires that for the establishment of the scope for the group management system the boundaries and applicability of the group management system shall be determined.	YES	<p>PCSN II: "4.3.1 The group organisation has no minimum or maximum number of participants".</p> <p>PCSN II: "4.3.2 There is no minimum or maximum surface area applicable to participate in the group organisation".</p> <p>PCSN II: "4.3.4 The group organisation defines a scope".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to define the scope of the group management system (4.3).</p>
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	YES	<p>PCSN II: "4.3.3 The group organisation shall comply with all the requirements of PCSN I".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires compliance with PCSN I (SFM standard) at the group level.</p>
4.3.4 The standard requires that the scope shall be made available as documented information.	YES	<p>PCSN II: "4.3.4 The group organisation defines a scope".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to define the scope. Although the scope is not required to be available as "documented information", clause 4.3.4 ensures that the scope is defined and available.</p>
4.4 Group management system		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
4.4.1 The standard requires that all participants shall be subject to the internal monitoring and the internal audit programme.	YES	4.4.1 All participants are part of the internal monitoring and internal audit. Compliance: Conformity Justification: PCSN II satisfies the requirement.
4.4.2 The standard requires that a certified PEFC chain of custody system shall be in place if a group entity acts as a trader of forest based material not covered by group certificate.	YES	4.4.2 If a group manager also acts as a trader of forest and/or tree products, he/she shall also have a PEFC Chain of Custody certificate. Compliance: Conformity Justification: The document requires the group entity to obtain PEFC CoC certification if it trades timber not covered by the group certification.
5. Leadership		
5.1 Organisational roles, responsibilities and authorities		
5.1.1 Functions and responsibilities of the group entity		
The standard requires that the following functions and responsibilities of the group entity shall be specified:		
a) to implement and maintain an effective management system covering all participants of the group;	YES	PCSN II: "5.1.1 The group manager is responsible for: a) Managing a group management system for all participants..."; Compliance: Conformity Justification: The document satisfies the PEFC requirement
b) to represent the group organisation in the certification process, including in communications and relationships with the certification body, submission of an application for certification, and contractual relationship with the certification body;	YES	PCSN II: "5.1.1 The group manager is responsible for: b) The application for certification at an accredited certification body recognised by PEFC Netherlands". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) to establish written procedures for the management of the group organisation;	YES	PCSN II: "5.1.1 The group manager is responsible for:... c) Preparation and management of documentation on the structure and responsibilities within the organisation acting as group manager..." Compliance: Conformity Justification: The document satisfies the PEFC requirement
d) to establish written procedures for the acceptance of new participants of the group organisation. These acceptance procedures shall cover at least the verification of the applicant's information about contact details, clear identification of their forest property and its/their size(s)	YES	PCSN II: "5.1.2 The group manager is responsible for: a) Establishing and managing documented procedures for accepting new participants from the group organisation and managing individual participant data and documents. The data required for acceptance includes at least: general contact information, a clear description of the (forest) area and the size of the (forest) area".

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The document satisfies the PEFC requirement
e) to establish written procedures for the suspension and exclusion of participants who do not correct/close nonconformities. Group participants excluded from any certification group based on nonconformities cannot be accepted within 12 months after exclusion	YES	PCSN II: "5.1.2 The group manager is responsible for: b) Establish and manage documented procedures for the handling of deviations and corrective actions by the participants. c) Establish and maintain documented procedures for internal monitoring programmes that assess participants' compliance with PCSN I" PCSN II: "10.1.3 After removal from the collective, a participant shall first undergo an internal audit by the group manager before being readmitted. The internal audit shall not take place earlier than 12 months after the removal". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
f) to keep documented information of: i. the group entity and participants' conformity with the requirements of the sustainable forest management standard, and other applicable requirements of the forest certification system, ii. all participants, including their contact details, identification of their forest property and its/their size(s), iii. the certified area, iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;	YES	PCSN II: "5.1.2 The group manager is responsible for: a) Establishing and managing documented procedures for accepting new participants from the group organisation and managing individual participant data and documents. The data required for acceptance includes at least: general contact information, a clear description of the (forest) area and the size of the (forest) area". b) Establish and manage documented procedures for the handling of deviations and corrective actions by the participants c) Establish and maintain documented procedures for internal monitoring programmes that assess participants' compliance with PCSN I". PCSN II: "5.1.3.1 "The group manager shall keep records of all participants and the total certified area. The data and changes shall be provided to the certification body and to PEFC Netherlands according to the Internal Registration Rules of the PEFC Council (PEFC GD 1008:2019)". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
g) to establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the sustainable forest management standard. The group entity shall have a written contract or other written agreement with all participants covering the right of the group entity to implement and enforce any corrective or preventive measures, and to initiate the exclusion of any participant from the scope of certification in the event of nonconformity	YES	PCSN II, 5.1.3.2: "The group manager shall enter into an agreement with each owner/manager applying for the group certificate which obligates the owner/manager to comply with the Dutch PCSN I - PEFC Standard. The following must be taken into account: i. The agreement must be signed by the owner. ii. The owner has (sufficient) knowledge of PCSN I - PEFC Standard Netherlands. iii. The owner has the duty to act according to the Dutch legislation, specifically in the field of forest and tree management and the PCSN I - PEFC Standard Netherlands.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>with the sustainable forest management standard;</p> <p>Note: The requirements for “participant commitment” and “written contract or other written agreement with all participants” may also be satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners’/managers’ association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>		<p>iv. If deviations are found during the internal/external audit, the owner shall implement the necessary corrective and preventive actions, following the instructions of the group manager.</p> <p>v. The validity of the agreement shall not exceed five years, where after it must be renewed.</p> <p>vi. The group manager has the possibility to exclude participants from the group certificate if serious deviations from the PCSN I - PEFC Standard Netherlands are found.</p> <p>vii. The owner grants permission to the group manager and certifying body to conduct internal audits or inspection audits.</p> <p>viii. The owner has the duty to immediately report changes in ownership, name”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires a written agreement between a participant and the group manager that allows to enforce the certification requirements and any corrective/preventive measures and exclude the participant from the group certification.</p>
h) to provide all participants with a document confirming participation in the group forest certification;	YES	<p>PCSN II: “5.1.3.3 The group manager shall provide proof of participation to each individual owner/manager who has signed the agreement. The proof of participation shall include at least the following elements:...”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
i) to provide all participants with information and guidance required for the effective implementation and maintenance of the sustainable forest management standard and other applicable requirements of the forest certification system;	YES	<p>PCSN II, 5.1.1: “The group manager is responsible for:</p> <p>d) Providing information and assistance in implementing the PCSN I standard.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
j) to address nonconformities reported from group members which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members;	YES	<p>PCSN II, 5.1.1: “The group manager is responsible for:...</p> <p>f) Address nonconformities that were communicated by the group member(s) that were identified under other PEFC certifications and ensure implementation with all group members”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
k) to operate an internal monitoring programme that provides for the	YES	<p>PCSN II: “5.1.2 The group manager is responsible for:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
evaluation of the participants' conformity with the certification requirements;		c) Establish and maintain documented procedures for internal monitoring programmes that assess participants' compliance with PCSN I. Compliance: Conformity Justification: The document satisfies the PEFC requirement.
l) to operate an annual internal audit programme covering both group members and group entity;	YES	PCSN II: "5.1.4 The group manager is responsible for: b) The group manager carries out a programme of internal audits. All relevant (forest) areas and the own organisation are included in this programme". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
m) to operate a management review of the group forest certification and acting on the results from the review;	YES	PCSN II: "5.1.4 The group manager is responsible for: d) Establish and maintain an annual central assessment of the effectiveness of the group management system to comply with PCSN I and II. The input for an annual central assessment will include the following information: - results of internal and external audits; - feedback from participating (forest) owners and interested parties; - The status and effectiveness of corrective actions; - changes that may affect the management system, this includes changes in PCSN I-X, changes in legislation and regulations as far as relevant for PCSN I and changes in the organisation of the group manager - complaints from interested parties." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
n) to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, PEFC International or the National Governing Body for relevant data, documentation or other information; allowing access to the forest area covered by the group organisation and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system.	YES	PCSN II: "5.1.1 The group manager is responsible for: e) Providing full cooperation and assistance in responding effectively to enquiries/requirements of the certification body, accreditation body, PEFC Netherlands or PEFC International, or providing relevant data, information or other information, granting access to the (forest) area covered by the group organisation and other facilities either in relation to formal audits or assessments or otherwise related to, or with implications for, the group management system." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
5.1.2 Function and responsibilities of participants The standard requires that the following functions and responsibilities of the participants shall be specified:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>a) To provide the group entity with a binding written agreement, including a commitment on conformity with the sustainable forest management standard and other applicable requirements of the forest certification system; group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion.</p> <p>Note: The requirement for “written agreement” and participants’ “commitment” is also satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners’/managers’ association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>	YES	<p>PCSN II: “5.1.3.2 The group manager shall enter into an agreement with each owner/manager applying for the group certificate which obligates the owner/manager to comply with the Dutch PCSN I - PEFC Standard. The following must be taken into account:</p> <p>iii. The owner has the duty to act according to the Dutch legislation, specifically in the field of forest and tree management and the PCSN I - PEFC Standard Netherlands”.</p> <p>PCSN II: “10.1.3 After removal from the collective, a participant shall first undergo an internal audit by the group manager before being readmitted. The internal audit shall not take place earlier than 12 months after the removal”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document does not include a specific chapter with responsibilities of the participants. However, the chapter on written agreement between the group entity and participant clearly defines the participants responsibility.</p>
<p>b) To provide the group entity with information about previous group participation.</p>	YES	<p>PCSN II: “5.1.2.2 The group participant is required to:</p> <p>a) Provide the group manager with information regarding previous participations in PEFC certifications.</p> <p>b) Provide the group manager with information regarding nonconformities that have been raised in previous PEFC certifications.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires the participant to provide information on previous group certifications.</p>
<p>c) to comply with the sustainable forest management standard and other applicable requirements of the certification system as well as with the requirements of the management system;</p>	YES	<p>PCSN II: “5.1.3.2 The group manager shall enter into an agreement with each owner/manager applying for the group certificate which obligates the owner/manager to comply with the Dutch PCSN I - PEFC Standard. The following must be taken into account:</p> <p>iii. The owner has the duty to act according to the Dutch legislation, specifically in the field of forest and tree management and the PCSN I - PEFC Standard Netherlands”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
<p>d) to provide full co-operation and assistance in responding effectively to all requests from the group entity, or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise</p>	YES	<p>PCSN II: “5.1.3.2 The group manager shall enter into an agreement with each owner/manager applying for the group certificate which obligates the owner/manager to comply with the Dutch PCSN I - PEFC Standard. The following must be taken into account:</p> <p>vii. The owner grants permission to the group manager and certifying body to conduct internal audits or inspection audits.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
related or with implications for the management system;		Compliance: Conformity Justification: The permission to conduct internal audits and "inspection audits" implies that the person conducting the audits has an access to all facilities and documentation.
e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification.	NO	PCSN II: "5.1.2.2 The group participant is required to: a) Provide the group manager with information regarding previous participations in PEFC certifications. b) Provide the group manager with information regarding nonconformities that have been raised in previous PEFC certifications." Compliance: Minor non-conformity Justification: The document requires the participant to provide information on non-conformities in the previous certifications. However, this does not cover a situation where a forest/land owner would be covered at the same time by more PEFC certifications.
f) to implement relevant corrective and preventive actions established by the group entity.	YES	PCSN II: "5.1.3.2 The group manager shall enter into an agreement with each owner/manager applying for the group certificate which obligates the owner/manager to comply with the Dutch PCSN I - PEFC Standard. The following must be taken into account: iv. If deviations are found during the internal/external audit, the owner shall implement the necessary corrective and preventive actions, following the instructions of the group manager." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
5.2 Commitment and policy		
5.2.1 The standard requires that the group entity shall provide a commitment:		
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;	YES	PCSN II: "5.2.1 The Group Manager shall prepare a statement to the effect that: a) PCSN I is complied with..." Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) to integrate the group certification requirements in the group management system;	YES	PCSN II: "5.2.1 The Group Manager shall prepare a statement to the effect that: ... b) Group certification requirements are integrated into the group management system ..." Compliance: Conformity Justification: The document satisfies the PEFC requirement.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
c) to continuously improve the group management system;	YES	<p>PCSN II: "5.2.1 The Group Manager shall prepare a statement to the effect that: ... c) the group management system is continuously improved".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	YES	<p>PCSN II: "5.2.1 The Group Manager shall prepare a statement to the effect that: ... d) The improvement of sustainable (forest) management is continuously supported.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
5.2.2 The commitment of the group entity may be part of a group management policy and shall be publicly available as documented information upon request.	YES	<p>PCSN II: "5.2.2 The group manager's statement may be part of a group management policy and shall be made publicly available upon request".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	YES	<p>PCSN II: "5.2.3 Participants shall provide a statement to the effect that: a) The rules of the group management system are complied with..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) to implement the requirements of the sustainability standard in their operations in their area.	YES	<p>PCSN II: "5.2.3 Participants shall provide a statement to the effect that: ... b) The requirements of this standard are implemented in the day-to-day operation in their area.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
6. Planning		
6.1 The standard requires that if a group organisation plans any changes in the group management system, these changes shall be included in a group management plan.	YES	<p>PCSN II: "6.1 The group organisation draws up a group management plan".</p> <p>PCSN II: 6.2 If a group organisation plans changes in the group management system, these changes will be included in the group management plan.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
6.2 The standard requires that if a group organisation decides to fulfil requirements of the sustainable forest management standard on the group level, these	YES	<p>PCSN II: "6.3 If a group organisation decides to implement certain requirements of PCSN I at group level, these requirements will be included in a group management plan".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
requirements shall be considered in a group management plan.		Compliance: Conformity Justification: The document satisfies the PEFC requirement.
7. Support		
7.1 The standard requires that resources needed for the establishment, implementation, maintenance and continual improvement of the group management system shall be determined and provided.	YES	PCSN II: "7.1 Funds will be made available for establishing, managing and improving the group management system". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	YES	PCSN II: "7.2 The individual holding final responsibility within the group management has, at least, completed a specialised education programme in forest and nature management and has at least five years of working experience in the forest and nature sector". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
7.3 The standard requires that communication processes shall be in place to raise the awareness of participants concerning:		
a) the group management policy;	YES	PCSN II: " 7.3 The group manager will have described communication processes to make the participants aware of: a) The group management policy ...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) the requirements of the sustainable forest management standard;	YES	PCSN II: "7.3 The group manager will have described communication processes to make the participants aware of: ... b) The requirements of PCSN I ...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance;	YES	PCSN II: "7.3 The group manager will have described communication processes to make the participants aware of: ...c) Their contribution to the group management system and to improving group performance. ...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
d) the implications of not conforming with the group management system requirements.	YES	<p>PCSN II: "7.3 The group manager will have described communication processes to make the participants aware of: ...</p> <p>d) The implications of not meeting the requirements of PCSN I".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
7.4 The standard requires that the internal and external communications relevant to the group management system shall be determined. This includes:		
a) on what to communicate;	YES	<p>PCSN II: "7.4 Both internal and external communication processes, relevant to the group management system, shall be in place, stating:</p> <p>a) What is communicated; ...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) when to communicate;	YES	<p>PCSN II: "7.4 Both internal and external communication processes, relevant to the group management system, shall be in place, stating: ...</p> <p>b) When communication will take place; ...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) with whom to communicate;	YES	<p>PCSN II: "7.4 Both internal and external communication processes, relevant to the group management system, shall be in place, stating: ...</p> <p>c) With whom there is communication; ...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
d) how to communicate.	YES	<p>PCSN II: "7.4 Both internal and external communication processes, relevant to the group management system, shall be in place, stating: ...</p> <p>d) How communication takes place".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
7.5 The standard requires that appropriate mechanisms shall be in place for resolving complaints and disputes relating to group management and sustainable forest management operations.	YES	<p>PCSN II "7.5 There shall be documented procedures for handling complaints related to forest management or trees outside the forest".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
7.6 The standard requires that the documented information relevant to the group management system and the conformance with the requirements of the sustainable forest management standard is:		
a) up to date;	YES	<p>PCSN II: "7.6 The data relevant to demonstrate that group management meets the requirements of PCSN I shall:</p> <p>a) Be up to date ..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) available and suitable for use, where and when it is needed;	YES	<p>PCSN II: "7.6 The data relevant to demonstrate that group management meets the requirements of PCSN I shall: ...</p> <p>b) Be available and suitable for use, when and where required".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	YES	<p>PCSN II: "7.6 The data relevant to demonstrate that group management meets the requirements of PCSN I shall:</p> <p>c) Be properly protected against loss of confidentiality, unreasonable use and loss of integrity."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
8. Operation		
8.1 The standard requires that the group organisation shall plan, implement and control processes needed:		
a) to meet the requirements of the group certification standard and the sustainable forest management standard and	YES	<p>PCSN II: "8.1 The group organisation will plan, implement and monitor the necessary processes:</p> <p>a) To fulfil the requirements of PCSN I and PCSN II ..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) to implement the actions determined in 6.	YES	<p>PCSN II: "8.1 The group organisation will plan, implement and monitor the necessary processes: ... b) To implement the actions under point 6".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
8.2 The standard requires that this planning, implementing and controlling shall be done by:		
a) defining the necessary processes and establishing criteria for those;	YES	<p>PCSN II: "8.2 Planning, implementation and monitoring will be done by:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>a) Defining the necessary processes and using criteria to do so ...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) implementing control of the processes in accordance with the criteria;	YES	<p>PCSN II: "8.2 Planning, implementation and monitoring will be done by: ..</p> <p>b) Implementing the inspection of these processes according to the criteria ...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.	YES	<p>PCSN II: "8.2 Planning, implementation and monitoring will be done by: ...</p> <p>c) Maintaining records of these checks that may assist in demonstrating that the processes were carried out as planned".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that an ongoing internal monitoring programme provides confidence in the conformity of the group organisation with the sustainable forest management standard. In particular, it shall be determined:		
a) what shall be monitored and measured;	YES	<p>PCSN II: 9.1.1 The following elements shall be implemented within the annual internal monitoring programme:</p> <p>a) Verification that the owner has provided documentation confirming that the forest or trees outside the forest area are owned by the applicant.</p> <p>b) Verification that the management plan complies with PCSN I. If it does not comply, the group manager shall not request the certification body to add the owner to the group certificate.</p> <p>c) Verification that the copy of the owner's felling report with the authorities if the owner will handle the felling. d) Verification in clear-cut areas larger than 2 hectares of whether the usefulness and necessity of this is substantiated in the forest management plan and justified by an expert opinion.</p> <p>e) Verification of which owners are obliged to review and update their management plan due to PCSN I, Annex 1 element 6. Then the group manager collects those management plans and checks whether they comply with PCSN I.</p> <p>f) Verification of the annual management accounts described in PCSN I, criterion 6.2.2 for significant</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>deviations from the management planning and identify the owner's reason for any such significant deviation.</p> <p>g) Verification of whether planting material has been used that is from the Dutch List of Varieties of Trees, if planting material is planted (see criteria 7.4.3 b).</p> <p>h) Verification of whether contractors hired by the owners comply with PCSN I, criterion 7.6.4."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes an identical requirement to PEFC ST 1002:2018.</p>
b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;	YES	<p>The methods for monitoring are specified under each monitoring object (9.1.1a).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) when the monitoring and measuring shall be performed;	YES	<p>The monitoring is defined as annual for all the monitoring objects (9.1.1a).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
d) when the results from monitoring and measurement shall be analysed and evaluated;	YES	<p>The monitoring is defined as annual for all the monitoring objects (9.1.1a).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
e) what documented information shall be available as evidence of the results.	YES	<p>Information needed for for monitoring is specified under each monitoring object or is implicit from the object (9.1.1a).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
9.1.2 The standard requires that the group entity shall evaluate the group management performance and the effectiveness of the group management system concerning the implementation of the sustainable forest management requirements.	YES	<p>PCSN II: "9.1.2 The group manager shall evaluate the execution of the group management and the effectiveness regarding the implementation of the group management system for PCSN I."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
9.2 Internal audit		
9.2.1 Objectives		
9.2.1.1 The standard requires that an annual internal audit programme shall provide information on whether the group management system:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
a) conforms to i. the group organisation's own requirements for its group management system; ii. the requirements of the national group certification standard;	YES	PCSN II: "9.2.1.1 The annual internal audit shall provide information confirming that the group management system: a) Complies with: i. The requirements of the own group management system ii. The requirements of PCSN II ...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) ensures the implementation of the sustainable forest management standard on the participant level;	YES	PCSN II: "9.2.1.1 The annual internal audit shall provide information confirming that the group management system: ... b) Ensures that the requirements of PCSN I are implemented at participant level of participants ...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) is effectively implemented and maintained.	YES	PCSN II: "9.2.1.1 The annual internal audit shall provide information confirming that the group management system: ... c) Is effectively implemented and maintained". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.2.1.2 The standard requires that the internal audit programme shall cover the group entity and all group participants. The group entity shall be audited annually. The participants may be selected on a sample basis.	YES	PCSN II: "5.1.4 Responsibility of the group manager: d) Establish and maintain an annual central assessment of the effectiveness of the group management system to comply with PCSN I and II.". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.2.2 Organisation		
The standard requires an internal audit programme which shall cover at least:		
a) planning, establishing, implementing and maintaining an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	YES	PCSN II: " The internal audit programme shall include, at least: a) The planning, establishment, implementation and maintenance of the audit programme. This includes the frequency, methods, responsibilities, planning requirements and reporting, taking into account the importance of processes and results of previous audits....". Compliance: Conformity Justification: The document satisfies the PEFC requirement.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
b) definition of the audit criteria and scope for each audit;	YES	PCSN II: "The internal audit programme shall include, at least: ... b) Definitions of the audit criteria for each audit...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) competence of internal auditor (forest knowledge, standard knowledge);	YES	PCSN II: " The internal audit programme shall include, at least: ... c) The competence of an internal auditor...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;	YES	PCSN II: " The internal audit programme shall include, at least: ... d) The selection of auditors who will perform the audits to ensure that the audit process is carried out independently...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
e) ensuring that the results of the audits are reported to relevant group management;	YES	PCSN II: " The internal audit programme shall include, at least: ... e) Assurance that the results of audits are recorded and passed on to the relevant group manager...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	YES	PCSN II: " The internal audit programme shall include, at least: ... f) Maintenance of documented information as evidence of the implementation of the audit programme and internal audits". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.3 Selection of participants in the internal audit programme		
9.3.1 General		
9.3.1.1 The standard requires the establishment of requirements for the selection of participants in the internal audit programme. These requirements shall include the following procedures for:		
a) determination of the sample size (9.3.2);	YES	PCSN II: "9.3.1 The sample size for the internal field audit is based on a stratified sample: i. $\sqrt{}$ of participants with no more than 75 ha, rounded up to the nearest whole number. If all participants in this category annually

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>provide the group manager with additional management information via an annual evaluation with audit forms from second or third parties (see PCSN X, clause 4), then the sample size may be reduced by a factor of 0.6. That is, the sample size is rounded up to $0.6\sqrt{x}$. And;</p> <p>ii. $\sqrt{}$ of participants with more than 75 ha, rounding up”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) determination of sample categories(9.3.3);	YES	<p>See PEFC requirement 9.3.1a</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN II defines to sample categories: forest owners above and below 75 ha.</p>
c) distribution of the sample to the categories (9.3.4);	YES	<p>See PEFC requirement 9.3.1a</p> <p>PCSN II defines that the sampling shall be done separately for each category.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN II defines that the sampling shall be done separately for each category.</p>
d) selection of the participants (9.3.5).	YES	<p>PCSN II: "9.3.2 At least 25% of the sample for field audits shall be randomly determined.</p> <p>PCSN II: "9.3.3 The selection criteria of sites for the non-randomly selected participants should consider the following aspects:</p> <ul style="list-style-type: none"> i. Results of internal audits, including results of annual internal desk audits and past certification audits; ii. Records of complaints and other relevant aspects of corrective and preventive action; iii. Significant variations in production processes of the sites; iv. Intensity of forest management activities in the given locations (more intensive management requires higher audit frequency)". <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN II defines that the sampling shall be done separately for each category.</p>
9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level.	N/A	<p>Compliance: Not mandatory requirement</p> <p>Justification:</p> <p>Not mandatory requirement. PCSN II does not define additional element for sampling of participants</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
9.3.1.3 The standard shall define additional sampling requirements in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, SFM programme and submission to tax programming which have their own members.	N/A	Compliance: Not mandatory requirement Justification: Not mandatory requirement. PCSN II does not define additional element for sampling of participants
9.3.2 Determination of the sample size		
9.3.2.1 The sample size shall be calculated for the participants of the group organisation.	YES	PCSN II: "9.3.1 The sample size for the internal field audit is based on a stratified sample: <ul style="list-style-type: none"> i. $\sqrt{\text{of participants with no more than 75 ha, rounded up to the nearest whole number. If all participants in this category annually provide the group manager with additional management information via an annual evaluation with audit forms from second or third parties (see PCSN X, clause 4), then the sample size may be reduced by a factor of 0.6. That is, the sample size is rounded up to }0.6\sqrt{x}\text{. And;}}$ ii. $\sqrt{\text{of participants with more than 75 ha, rounding up"}}$. Compliance: Conformity Justification: The document is stricter than PEFC ST 1002:2018 as it requires the sampling to be carried out separately for two sampling categories.
9.3.2.2 The size of the sample generally should be the square root of the number of participants: ($y=\sqrt{x}$), rounded to the upper whole number.	YES	See PEFC requirement 9.3.2.1 Compliance: Conformity Justification: The document defines sample that is based on $\sqrt{\text{of participants}}$. Reductions are allowed based on results of the internal monitoring programme.
9.3.2.3 The size of the sample may be adapted by a standard taking into account one or more of the following indicators:		
a) results of a risk assessment. In this case deviations of sample sizes in case of low or high risk for individual categories shall be defined;	N/A	Compliance: Not applicable (not mandatory requirement) Justification: The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point c of PEFC ST 1002:2018, 9.3.2.3.
b) results of internal audits or previous certification audits;	N/A	Compliance: Not applicable (not mandatory requirement) Justification: The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point c of PEFC ST 1002:2018, 9.3.2.3.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
c) quality / level of confidence of the internal monitoring programme;	YES	<p>PCSN II: "9.3.1 The sample size for the internal field audit is based on a stratified sample:</p> <p>iii. √ of participants with no more than 75 ha, rounded up to the nearest whole number. If all participants in this category annually provide the group manager with additional management information via an annual evaluation with audit forms from second or third parties (see PCSN X, clause 4), then the sample size may be reduced by a factor of 0.6. That is, the sample size is rounded up to $0.6\sqrt{x}$. And;</p> <p>iv. √ of participants with more than 75 ha, rounding up".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document is stricter than PEFC ST 1002:2018 as it requires the sampling to be carried out separately for two sampling categories.</p>
d) use of technologies allowing the gathering of information concerning specified requirements; Note: Such technologies may be e.g., the use of satellite data or drones and allow compliance statements for specific requirements of a sustainability standard or support the risk based sampling.	N/A	<p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point c of PEFC ST 1002:2018, 9.3.2.3.</p>
e) based on other means of gathering information about activities on the ground. Note: One way could be a survey with participants who provide some information about their activities on the ground.	N/A	<p>Compliance: Not applicable (not mandatory requirement)</p> <p>Justification:</p> <p>The document does not apply all options provided by PEFC ST 1002:2018 and only applies bullet point c of PEFC ST 1002:2018, 9.3.2.3.</p>
9.3.3 Determination of sample categories		
9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment:		
a) ownership type (e.g. state forest, communal forest, private forest);	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
b) size of management units (different size classes);	YES	<p>PCSN II: "9.3.1 The sample size for the internal field audit is based on a stratified sample:</p> <p>v. √ of participants with no more than 75 ha, rounded up to the nearest whole number. If all participants in this category annually provide the group manager with additional management information via an annual evaluation with audit forms from second or third parties (see PCSN X, clause 4), then the sample size may be reduced by a factor</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>of 0.6. That is, the sample size is rounded up to $0.6\sqrt{x}$. And; vi. $\sqrt{\text{of participants with more than 75 ha, rounding up"}}$.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines sampling categories based on size of the management units that results in two categories below and above 75 ha. The approach is justifiable as: the Netherlands is a small country with similar natural conditions and management systems.</p>
c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
d) operations, processes and products of potential group participants;	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
e) deforestation and forest conversion;	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
f) rotation period(s);	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
g) richness of biological diversity;	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
h) recreation and other socio-economic functions of the forest;	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
i) dependence of and interaction with local communities and indigenous people;	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
j) available resources for administration, operations, training and research;	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
k) governance and law enforcement.	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN II (9.3.1) defines sample categories based on size of the management units.</p>
9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the respective consequences for the sampling shall be defined.	N/A	<p>PCSN II requires that the sample is calculated separately for each sampling category (9.3.1). This means that the sample is not distributed to the sample categories but is calculated separately for them based on number of participants in each category.</p> <p>The approach of PCSN II always results in higher size of the total sample (for all categories) than the approach defined in PEFC ST 1002:2018. Also, the risk evaluation is not necessary because the sample is calculated for consistent category.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The risk is classified on the scale from 0 to 2. Three sample categories are then defined in 9.3.4.1 based on a total risk score achieved: 1-5 = low risk category, 5-10 medium risk category, 15+ high risk category.</p>
<p>9.3.4 Distribution of the sample</p> <p>The sample shall be distributed to the categories according to the result of the risk assessment.</p>	N/A	<p>PCSN II requires that the sample is calculated separately for each sampling category (9.3.1). This means that the sample is not distributed to the sample categories but is calculated separately for them based on number of participants in each category.</p> <p>The approach of PCSN II always results in higher size of the total sample (for all categories) than the approach defined in PEFC ST 1002:2018. Also, the risk evaluation is not necessary because the sample is calculated for consistent category.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The risk is classified on the scale from 0 to 2. Three sample categories are then defined in 9.3.4.1 based on a total risk score achieved: 1-5 = low risk category, 5-10 medium risk category, 15+ high risk category.</p>
9.3.5 Selection of the participants		
9.3.5.1 At least 25% of the sample should be selected at random.	YES	<p>PCSN II: "9.3.2 At least 25% of the sample for field audits shall be randomly determined".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.	YES	<p>PCSN II: "9.3.3 The selection criteria of sites for the non-randomly selected participants should consider the following aspects:</p> <ul style="list-style-type: none"> i. Results of internal audits, including results of annual internal desk audits and past certification audits; ii. Records of complaints and other relevant aspects of corrective and preventive action;

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>iii. Significant variations in production processes of the sites; iv. Intensity of forest management activities in the given locations (more intensive management requires higher audit frequency).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document defines risk aspects to be considered in selection of participants to the sample.</p>
9.4 Management review		
9.4.1 The standard requires that an annual management review shall at least include:		
a) the status of actions from previous management reviews;	YES	<p>PCSN II: "9.4.1 The group manager shall assess, at least, the following elements:</p> <p>a) The status of the actions of previous management reviews ...".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
b) changes in external and internal issues that are relevant to the group management system;	YES	<p>PCSN II: "9.4.1 The group manager shall assess, at least, the following elements:...</p> <p>c) The compliance status with PCSN I, including the results of the internal monitoring, the internal audit, and the evaluations of the certification body;..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
c) the status of conformity with the sustainable forest management standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance;	YES	<p>PCSN II: "9.4.1 The group manager shall assess, at least, the following elements:...</p> <p>c) The compliance status with PCSN I, including the results of the internal monitoring, the internal audit, and the evaluations of the certification body;..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>
<p>d) information on the group performance, including trends in:</p> <p>i. nonconformities and corrective actions;</p> <p>ii. monitoring and measurement results;</p> <p>iii. audit results;</p>	YES	<p>PCSN II: "9.4.1 The group manager shall assess, at least, the following elements:</p> <p>d) Information on the collective's performance, including trends in:</p> <p>i) Deviations and corrections</p> <p>ii) Monitoring and measurement results</p> <p>iii) Audit results".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document satisfies the PEFC requirement.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
e) opportunities for continual improvement.	YES	PCSN II: "9.4.1 The group manager shall assess, at least, the following elements: iv) Opportunities for continuous improvement". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.4.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the group management system.	YES	PCSN : "9.4.2 The results of the management review shall contribute to the continual improvement and change of the group management system". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	YES	PCSN II "9.4.3 The group organisation shall retain documented information as evidence of the results of the management review". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	PCSN II: "10.1.1 If a deviation is found, the group organisation shall: (a) Resolve the deviation and, where applicable: i. Take action to improve the deviation ii. Handle the consequences...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;	YES	PCSN II: "10.1.1 If a deviation is found, the group organisation shall: ... c) Assess whether any actions are required to resolve particular causes of the deviation so that it does not happen again ...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
c) implement any action needed;	YES	PCSN II: "10.1.1 If a deviation is found, the group organisation shall: (a) Resolve the deviation and, where applicable: i. Take action to improve the deviation...". Compliance: Conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The document satisfies the PEFC requirement.
d) review the effectiveness of any corrective action taken;	YES	PCSN II: "10.1.1 If a deviation is found, the group organisation shall: ... d) Assess the effectiveness of any corrective action taken...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
e) make changes to the group management system, if necessary.	YES	PCSN II: "10.1.1 If a deviation is found, the group organisation shall: e) Make changes to the group management system when required". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
10.1.2 The standard requires that the group organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	PCSN II: "10.1.2 The group organisation shall retain documented information as evidence of: a) The nature of the deviation and the actions taken as a result ...". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
b) the results of any corrective action.	YES	PCSN II: "10.1.2 The group organisation shall retain documented information as evidence of: ... b) The results of the solution". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
10.1.3 The standard requires that a participant who was excluded from a group certification shall be internally audited by the group entity before it is allowed to re-enter the group certification. The internal audit shall not take place sooner than 12 months after the exclusion.	YES	PCSN II: "10.1.3 After removal from the collective, a participant shall first undergo an internal audit by the group manager before being readmitted. The internal audit shall not take place earlier than 12 months after the removal". Compliance: Conformity Justification: The document satisfies the PEFC requirement.
10.2 Continual improvement The standard requires that the suitability, adequacy and effectiveness of the group management system and the sustainable management of the forest shall be continuously improved.	YES	PCSN II: "The applicability, adequacy and effectiveness of the group management system and the sustainable management of the forest and/or trees will be continuously improved." Compliance: Conformity Justification: The document satisfies the PEFC requirement.

Annex C: Detailed assessment of sustainable forest management standard

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
Context of the national standard and the organisations applying a PEFC endorsed standard		
4.1 General		
The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall:		
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level; Note: An example of a situation where a requirement can be defined as being at another level (e.g. group/regional) is monitoring of forest health. Through monitoring of forest health at regional level, and communicating of results at the FMU level, the objective of the requirement is met without the necessity to carry out the individual monitoring of each forest management unit.	YES	PCSN I: The Standard defines requirements that are applicable at the FMU level. Compliance: Conformity Justification: The standard includes requirements for FMU level, both management system (planning, monitoring, etc.) as well as performance-based requirements.
b) be clear, performance based and auditable;	YES	Compliance: Conformity Justification: The standard includes requirements that are clear, performance/based and auditable.
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	YES	PCSN I, Scope: "It is intended for several types of users: - Forest owners: the standard for forest owners includes the requirements and guidelines they shall follow to obtain PEFC certification for sustainable forest management. - Owners or managers of Trees outside Forests (TOF) areas. This standard includes specific requirements and guidelines which TOF owners or managers shall follow in order to obtain PEFC certification. - Certification bodies & group managers: the standard includes requirements for certification bodies and group managers, on which management levels of individual forest owners are assessed.." PCSN I: 7.6.4 "Any companies used for work in the forest shall meet the following conditions: - the contractor is aware of the content of this standard and will work in accordance therewith. Compliance: Conformity Justification: All requirements of the standard apply to forest owner/managers (Scope). The standard also requires that contractors are aware of the standard and comply with it.
d) require record-keeping that provides evidence of compliance with the	YES	PCSN I: "5.1 The owner/manager shall issue a declaration stating:

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
requirements of the forest management standards;		<p>a) that the owner/manager meets the standard for sustainable forest management and other requirements in the Netherlands PEFC Certification System; and</p> <p>b) a commitment to continuously improve the sustainable forest management."</p> <p>6.2.2 "Management records shall be kept. Management records are an annual management report. These shall include a summary of any work done, information about the amount of timber and other forest products felled and sold, and any variations from the plan as a minimum requirement".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires forest owners / managers to issue a declaration (a commitment) to comply with the standard and continuously improve forest management (5.1) and keep management records (6.2.2).</p>
<p>e) specify "100% PEFC certified", or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the claim "100% PEFC certified", and their translations into languages other than English, are published online on the PEFC website www.pefc.org.</p>	YES	<p>PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area:</p> <p>a) Customer identification</p> <p>b) The name of the owner/manager as the supplier of the product</p> <p>c) Product identification</p> <p>d) Quantity of products</p> <p>e) Delivery identification based on the date of delivery, delivery period or accounting period</p> <p>f) The "100% PEFC certified" claim</p> <p>g) The certificate number of the owner/manager".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard states that forest owner/manager with PEFC-recognised certificate issued against the Standard shall use PEFC claims "100% PEFC certified".</p>
f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim "100% PEFC-certified" or a system specific claim;	YES	<p>PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area:</p> <p>a) Customer identification</p> <p>b) The name of the owner/manager as the supplier of the product</p> <p>c) Product identification</p> <p>d) Quantity of products</p> <p>e) Delivery identification based on the date of delivery, delivery period or accounting period</p> <p>f) The "100% PEFC certified" claim</p> <p>g) The certificate number of the owner/manager".</p> <p>Compliance: Conformity</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Justification: The Standard requires that the usage of the PEFC claim "100% PEFC certified" is only allowed for products sourced from the certified area.
g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;	YES	PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area : a) Customer identification b) The name of the owner/manager as the supplier of the product c) Product identification d) Quantity of products e) Delivery identification based on the date of delivery, delivery period or accounting period f) The "100% PEFC certified" claim g) The certificate number of the owner/manager". Compliance: Conformity Justification: The Standard requires that the PEFC claim shall only be used for products originating in the certified area. By definition of PCSN I, the term certified area refers to an area that is certified against the PEFC standard in the Netherlands (PCSN I, 3.10).
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area : a) Customer identification b) The name of the owner/manager as the supplier of the product c) Product identification d) Quantity of products e) Delivery identification based on the date of delivery, delivery period or accounting period f) The "100% PEFC certified" claim g) The certificate number of the owner/manager". Compliance: Conformity Justification: The Standard defines information that shall be provided to customers for products originating from the certified area. The information complies with PEFC ST 2002:2020 (PEFC international CoC standard).
i) include an overview of applicable legislation, if requirements of this benchmark are not reflected in the regional, national or sub-national standard, because they are already addressed through the legislation.	YES	Compliance: Conformity Justification: The PCSN Standard is meeting the PEFC requirements directly through its provisions.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
4.2 Understanding the needs and expectations of affected stakeholders		
The standard requires that the organisation shall determine:		
a) the affected stakeholders that are relevant to the sustainable forest management;	YES	<p>PCSN I: 4.2 "The owner/manager shall:</p> <p>a) identify the stakeholders who are relevant to the sustainable management of the area (e.g. local residents and users); and</p> <p>b) identify the relevant requirements and expectations of these stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify relevant stakeholders. The term relevant stakeholders is broader than the PEFC definition of the term "affected stakeholder".</p>
b) the relevant needs and expectations of these stakeholders.	YES	<p>PCSN I: 4.2 "The owner/manager shall:</p> <p>a) identify the stakeholders who are relevant to the sustainable management of the area (e.g. local residents and users); and</p> <p>b) identify the relevant requirements and expectations of these stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify relevant needs and expectations of the identified stakeholders.</p>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope.	YES	<p>PCSN I defines the scope of the PEFC certification by chapter Scope (1).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I defines the scope of the PEFC certification by chapter Scope (1). Firstly, the standard applies to forest owners / managers, the standard applies to "certified areas", the scope of the management system is limited to activities that are defined by the requirements of the standard.</p>
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.	YES	<p>PCSN I:</p> <p>6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>Appendix 1 includes a detailed description of the forest management plans and integrates inventory of forest resources, its monitoring and review and continuous improvement.</p> <p>6.1.1 The owner/manager shall assess any risks and opportunities regarding compliance with the requirements of this standard for sustainable forest management. The scale and extent of these being implemented in the forest shall be taken into account.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: The planning requirement (6.2.1) integrates the requirements of an inventory, planning, monitoring and review with the overall objective of continuous improvement. The risk assessment is integrated in requirement 6.1.1.
5. Leadership		
5.1 The standard requires that the organisation shall provide a commitment:		
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;	YES	PCSN I: 5.1 "The owner/manager shall issue a declaration stating: a) that the owner/manager meets the standard for sustainable forest management and other requirements in the Netherlands PEFC Certification System; and b) a commitment to continuously improve the sustainable forest management. Compliance: Conformity Justification: The Standard requires the commitment to comply with the scheme requirements and to continuously improve the SFM.
b) to continuously improve the sustainable forest management system.	YES	5.1 "The owner/manager shall issue a declaration stating: a) that the owner/manager meets the standard for sustainable forest management and other requirements in the Netherlands PEFC Certification System; and b) a commitment to continuously improve the sustainable forest management. Compliance: Conformity Justification: The Standard requires the commitment to comply with the scheme requirements and to continuously improve the SFM.
5.2 The standard requires that this commitment shall be publicly available.	YES	PCSN I: 5.2 "This declaration shall be available to the public". Compliance: Conformity Justification: The Standard requires a publicly available commitment.
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	PCSN I: 5.3 "Any responsibilities for operating sustainable forest management shall be clearly defined and assigned." Compliance: Conformity Justification: The Standard requires to identify responsibilities for the SFM.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
6. Planning		
6.1 Actions to address risks and opportunities		
6.1.1 The standard requires that the organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered.	YES	<p>PCSN I: 6.1.1 "The owner/manager shall assess any risks and opportunities regarding compliance with the requirements of this standard for sustainable forest management. The scale and extent of these being implemented in the forest shall be taken into account".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify risk and opportunities, including consideration of size and scale of operations.</p>
6.1.2 The standard requires that inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard.	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p> <p>PCSN I: Appendix 1: "5. Attachments to the management plan A number of (map) attachments form part of the management plan: a) Ownership registration (proof of ownership and/or an extract from land registry records) b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams. e) Measures for working safely".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a management plan to comply with Appendix 1. Appendix 1 integrates inventory and mapping of forest resources and covers the scope of requirements of the whole standard.</p>
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		
a) elaborated and periodically updated or continually adjusted;	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "Forest management shall be documented in a ten-year management plan, which also includes the long-term vision. This guideline indicates the minimum requirements of the management plan, on the</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>basis of which a quality inspection can be carried out by the certification body".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires 10-year management plan.</p>
b) appropriate to the size and use of the forest area;	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1 defines detailed content of the plan and ensures that it is appropriate to the size and use of the forest area.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The suitability of the management plan to the size and use for the forest area is integrated into elements required by Appendix 1.</p> <p>It should be noted that the size of forest areas in the Netherlands are always small and the standard, as well as Appendix 1 has been developed to address the needs of the small ownership and the use of forest area.</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires compliance with legal requirements (6.3.1.1) and this also apply to forest management planning.</p>
d) adequately covering forest resources.	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>Appendix 1 includes detailed requirements for forest management plans, including description of forest</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		resources that ensures their coverage by the management plan.
6.2.2 The standard requires that management plans shall take into account the different uses or functions of the managed forest area.	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p> <p>PCSN I: Appendix 1: "2. Objectives A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation b) the required forest make-up, with attention being paid to the variety of types, blending, age structure, and structure on an ecosystem and type-based level. (Reference to SNL Nature Types (Subsidiestelsel Natuur en Landschap - Nature and Landscape Subsidy System) is sufficient) c) forest products (wood and non-wood) d) standing wood stocks, minimum and maximum felling e) improving biodiversity f) infrastructure."</p> <p>PCSN I: Appendix 1: "5. Attachments to the management plan A number of (map) attachments form part of the management plan: a) Ownership registration (proof of ownership and/or an extract from land registry records) b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams. e) Measures for working safely".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires management plan that complies with Appendix 1 (6.1.1). Appendix 1 then includes detailed elements of the management including description of forest resources (1), objectives (2), management activities (3), management planning (4), Attachments and maps (5), and monitoring and review (6). All those elements require to describe the forest resources and their functions (1, 5) that predefine other planned activities (2, 3, 4, 6).</p>
6.2.3 The standard requires that management plans shall include at least a description of the current forest management unit, long-term objectives,	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
and the average annual allowable cut, including its justification.		<p>the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access”.</p> <p>PCSN I: Appendix 1: “2. Objectives A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation b) the required forest make-up, with attention being paid to the variety of types, blending, age structure, and structure on an ecosystem and type-based level. (Reference to SNL Nature Types (Subsidiestelsel Natuur en Landschap - Nature and Landscape Subsidy System) is sufficient) c) forest products (wood and non-wood) d) standing wood stocks, minimum and maximum felling e) improving biodiversity f) infrastructure.”</p> <p>PCSN I: Appendix 1: “3. Management activities A description of the activities carried out to achieve the objectives. Attention is paid to this: a) felling...”</p> <p>PCSN I, 7.1.2: “The timber felling target included in the management plan shall not exceed the growth rate over the medium and long terms. This shall be supported by justifying the annual allowable cut in the management plan”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (6.2.1, Appendix 1) includes detailed requirements for the content of management plan, including forest resources description (1) and objective (2). Concerning the level of harvest, it requires that management activities shall pay attention to felling.</p> <p>The Standard requires the annual allowable cut and its justification to be included in the management plan (7.1.2).</p>
6.2.4 The standard requires that the annually allowable use of non-wood forest products shall be included in the management plan where forest management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.	N/A	<p>PCSN I: 6.2.1 “A management plan shall be drawn up in accordance with Appendix 1”.</p> <p>PCSN I: Appendix 1: “2. Objectives: A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation ... c) forest products (wood and non-wood)...”.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Standard (Appendix 1) includes detailed requirements for the content of management plan, including forest resources description (1) and objective (2). Harvest of</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>non-timber forest products is only very generally covered by the objectives of the management plan.</p> <p>Potential harvesting of non-timber products in the Netherlands such as berries, walnuts, branches or leaves for decoration purposes, is conducted in the Netherlands in a very small scale and does not affect sustainability of the resources. This is confirmed by a study provided by the PEFC Netherlands (https://edepot.wur.nl/412191)^[39].</p> <p>Concerning harvesting of Christmas tree, most of the Christmas tree production is linked to the Christmas tree plantations that are excluded from the PCSN certification (PCSN I, 3.2). Harvesting of Christmas trees in forest standards has a very small proportion (https://edepot.wur.nl/412191)^[39].</p> <p>The game management and its sustainability is governed by legislation and its main objectives is to regulate damages to forest stands.</p>
6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to forest ecosystems.	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p> <p>PCSN I: Appendix 1: "2. Objectives A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation b) the required forest make-up, with attention being paid to the variety of types, blending, age structure, and structure on an ecosystem and type-based level. (Reference to SNL Nature Types (Subsidiestelsel Natuur en Landschap - Nature and Landscape Subsidy System) is sufficient) c) forest products (wood and non-wood) d) standing wood stocks, minimum and maximum felling e) improving biodiversity f) infrastructure."</p> <p>PCSN I: Appendix 1: "3. Management activities A description of the activities carried out to achieve the objectives. Attention is paid to this: a) felling b) rejuvenation c) control of unwanted types and/or the use of plant protection products and biocides d) measures to improve biodiversity e) ensuring safe working practices - through training courses, for example f) results of any recent relevant scientific research g) risk of damage to third parties, through a Virtual Tree Assessment, for example h) landscape values".</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The Standard includes detailed requirements (elements) for a management plan including forest resources description, objectives and planned activities. The detail of those requirements ensures that forest owner/manager know the risks relating to forests (1) and the management activities (3) address the risks to ensure that the objectives are delivered (2).
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "3. Management activities A description of the activities carried out to achieve the objectives. Attention is paid to this: ... f) results of any recent relevant scientific research..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (Appendix 1) requires that attention is paid to results of any recent scientific research (3f).</p>
6.2.7 The standard requires that a summary of the management plan, appropriate to the scope and scale of forest management, shall be publicly available and shall include information on the general objectives and forest management principles.	YES	<p>PCSN I: 6.2.3 "The management plan, or a summary of this, shall be made available to the public. Any commercially sensitive information may be omitted".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard require public availability of forest management plans (6.2.3) with possible omission of commercially sensitive information.</p>
6.2.8 The standard requires that the publicly available summary of the management plan may exclude confidential business and personal information and other information made confidential by applicable legislation or for the protection of cultural sites or sensitive natural resource features.	YES	<p>PCSN I: 6.2.3 "The management plan, or a summary of this, shall be made available to the public. Any commercially sensitive information may be omitted".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard allows that any commercially sensitive information may be omitted from publication. (6.2.3).</p>
6.3 Compliance requirements		
6.3.1 Legal compliance		
<p>6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its forest management and determine how these compliance obligations apply to the organisation.</p> <p>Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the "legislation applicable to forest management" is defined by the VPA agreement.</p>	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires identification of the relevant regulations (6.3.1.1).</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anti-corruption and the payment of applicable royalties and taxes.	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires identification of the relevant regulations and defines areas of the applicable legislation that is complying with the PEFC requirement (6.3.1.1).</p>
6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-corruption measures appropriate to the risk of corruption.	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires compliance with anticorruption legislation (6.3.1.1). The Netherlands has an effective anticorruption legislation that is covered by two major laws</p> <ol style="list-style-type: none"> 1. The Criminal law: https://wetten.overheid.nl/BWBR0001854/2016-07-01 2. Law for Prevention of Money Laundering and Terrorist Financing: https://wetten.overheid.nl/BWBR0024282/2018-07-25 <p>The effectiveness of this legislation can be proven by the latest Corruption Perception Index of 2020, in which the Netherlands scores 82/100, that is ranking the country the number 8 out of 180. https://www.transparency.org/en/countries/netherlands</p>
6.3.1.4 The standard requires that measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	<p>PCSN I: "6.3.1.2 The owner/manager shall take action to prevent any unlawful activity as far as possible".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires anti-corruption measures to be implemented in compliance with the anti-corruption legislation.</p>
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that 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	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>the forest land shall be clarified, recognised and respected.</p> <p>Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.</p>		<p>corruption and the payment of applicable royalties and taxes.”</p> <p>PCSN I: Appendix 1: Content of the forest management plan.</p> <p>6. “a) Ownership registration (proof of ownership and/or an extract from land registry records)”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for tenure and land-use rights (6.3.1.1) and legal property rights (A1, 6).</p> <p>Customary and traditional rights are not applicable in the Dutch circumstances because all land use rights are regulated through legislation. A.o. via the Civil code 3: https://wetten.overheid.nl/BWBR0005291/2017-09-01/#Boek3_Titeldeel4_Afdeling3_Artikel99 and the cadastre code: https://wetten.overheid.nl/BWBR0004541/2017-09-01/#Hoofdstuk1</p>
<p>6.3.2.2 The standard requires that forest practices and operations shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved, or is in dispute, there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>	N/A	<p>Not applicable as there are no indigenous people in the Netherlands.</p>
<p>6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights.</p>	YES	<p>PCSN I:</p> <p>6.3.2.2 “The owner/manager shall use a CAO (collective working agreement) relevant to his/her members of staff”.</p> <p>6.3.2.3 “The owner/manager shall make a commitment to equal opportunities, zero discrimination and no antisocial behaviour in the workplace. Gender equality will be promoted”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I requires commitment to equal opportunities, zero discrimination and gender balance shall be promoted (6.3.2.3).</p>
6.3.3 Fundamental ILO conventions		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions.</p> <p>Note: In countries where the fundamental ILO conventions have been ratified, the requirements of 6.3.3.1 apply. In countries where a fundamental convention has not been ratified and its content is not covered by applicable legislation, specific requirements shall be included in the forest management standard.</p>	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes."</p> <p>The Netherlands has ratified all 8 ILO Conventions Supervising the application of International Labour Standards for Netherlands in 2020 (ilo.org).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Netherlands has ratified all eight fundamental ILO conventions and it can be assumed that those have been implemented through the national legislation. The national labour related legislation is referenced in PCSN requirement 6.3.1.1.</p>
6.3.4 Health, safety and working conditions		
<p>6.3.4.1 The standard requires that forest operations shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.</p>	YES	<p>PCSN I: 6.3.2.1 "Safety regulations have been adopted and personal protective equipment is used in accordance with the Forests and Nature Health and Safety at Work Manual. The forest owner shall provide instructions and ensure that his/her own employees, volunteers and private timber buyers comply with them".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I requires to adopt safety regulation and shall ensure usage of safety equipment (6.3.2.1) and makes a reference to the "Forests and Nature Health and Safety Manual^[40] ("Arbocatalogus Bos en Natuur", https://www.stigas.nl/agroarbo/bos-en-natuur).</p> <p>The manual includes detailed health and safety measures as well as Checklists for each area, including evaluation of health and safety related risks.</p>
<p>6.3.4.2 The standard requires that working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations. Working hours and leave shall comply with national laws or applicable collective agreements.</p> <p>Note: Guidance for specifying national standards can be obtained from the ILO Code of Good Practice: Safety and Health in Forestry Work.</p>	YES	<p>PCSN I: 6.3.2.1 "Safety regulations have been adopted and personal protective equipment is used in accordance with the Forests and Nature Health and Safety at Work Manual. The forest owner shall provide instructions and ensure that his/her own employees, volunteers and private timber buyers comply with them".</p> <p>PCSN I: 6.3.2.2 "The owner/manager shall use a CAO (collective working agreement) relevant to his/her members of staff".</p> <p>PCSN I: 7.6.4 "Any companies used for work in the forest shall meet the following conditions: - the contractor is aware of the content of this standard and will work in accordance therewith.</p> <p>- contractors shall be ErBo certified (Erkenningsregeling Bosaannemers - Recognition scheme for forest contractors), or meet demonstrably equivalent requirements.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>- contractors and subcontractors shall work in accordance with the Forests and Nature Health and Safety at Work Manual, the Working Conditions Act and the General Terms and Conditions for Forestry Subcontractors.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I requires to adopt safety regulation and shall ensure usage of safety equipment (6.3.2.1).</p>
<p>6.3.4.3 The standard requires that wages of local and migrant forest workers as well as of contractors and other operators operating in PEFC-certified areas shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements.</p> <p>Note: Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</p>	YES	<p>PCSN I: 6.3.2.2 "The owner/manager shall use a CAO (collective working agreement) relevant to his/her members of staff".</p> <p>PCSN I: 7.6.4 "Any companies used for work in the forest shall meet the following conditions: - the contractor is aware of the content of this standard and will work in accordance therewith.</p> <p>- contractors shall be ErBo certified (Erkenningsregeling Bosaannemers - Recognition scheme for forest contractors), or meet demonstrably equivalent requirements.</p> <p>- contractors and subcontractors shall work in accordance with the Forests and Nature Health and Safety at Work Manual, the Working Conditions Act and the General Terms and Conditions for Forestry Subcontractors".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The forest owner/manager shall use a collective working agreement (6.3.2.2). Contractors are required to comply with the Working Conditions Act and the the General Terms and Conditions for Forestry Subcontractors. (7.6.4).</p> <p>The collective working agreement and the Working Conditions Act and the the General Terms and Conditions for Forestry Subcontractors will ensure that wages will meet at least legal requirements and collective bargaining agreement.</p>
<p>6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and freedom from workplace harassment. Gender equality shall be promoted.</p>	YES	<p>6.3.2.3 "The owner/manager shall make a commitment to equal opportunities, zero discrimination and no antisocial behaviour in the workplace. Gender equality will be promoted".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for equal opportunities and non-discrimination and promotion of gender balance.</p>
7. Support		
7.1 Resources		
<p>7.1.1 The standard requires that the organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of</p>	YES	<p>PCSN I, 5.5: "The owner/manager will make (financial) resources available for planning, implementing and continuously improving any action which shall be taken to comply with this standard".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
the sustainable forest management system.		Compliance: Conformity Justification: The Standard requires availability of resources needed for planning, implementing, maintenance and continual improvement of actions required by the standard (5.5).
7.2 Competence		
7.2.1 The standard requires that forest managers, contractors, employees and forest owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to sustainable forest management, as a precondition for all management planning and practices described in this benchmark.	YES	PCSN I: 6.3.3.1 "All employees of the owner/manager working in forest management shall be made aware of the content of this standard and will work in accordance with it. They shall be sufficiently qualified and have undergone training in the field of working in forest management. Any training sessions shall be documented". PCSN I: 7.6.4 "Any companies used for work in the forest shall meet the following conditions: - the contractor is aware of the content of this standard and will work in accordance therewith. - contractors shall be ErBo certified (Erkenningsregeling Bosaannemers - Recognition scheme for forest contractors), or meet demonstrably equivalent requirements. - contractors and subcontractors shall work in accordance with the Forests and Nature Health and Safety at Work Manual, the Working Conditions Act and the General Terms and Conditions for Forestry Subcontractors. Compliance: Conformity Justification: The Standard requires all employees of the owner/manager to be aware of the standard, to be qualified and undergo training (6.3.3.1). Contractors shall be certified or otherwise demonstrate their competencies, shall be aware of the standard and comply with general terms and conditions for forestry subcontractors (7.6.4).
7.3 Communication		
7.3.1 The standard requires that effective communication and consultation with local communities, indigenous peoples and other stakeholders relating to sustainable forest management shall be provided.	NO	PCSN I: 5.4 The owner/manager communicates with the stakeholders, and explains the objectives and management plan". Compliance: Minor non-conformity Justification: The Standard requires the owner / manager to communicate with stakeholders. However, the requirement does not include the elements of "effective communication" and "consultation".
7.4 Complaints		
7.4.1 The standard requires that appropriate mechanisms are in place for resolving complaints and disputes relating	YES	PCSN I: 4.3 "The owner/manager shall have adequate procedures in place for handling complaints and disputes relating to forest work and working conditions". Compliance: Conformity

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
to forest management operations, land use rights and work conditions.		Justification: The Standard includes provisions for handling complaints and disputes (4.3).
7.5 Documented Information		
7.5.1 The standard requires that the organisation's management system shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system.	YES	PCSN I: 5.1 "The owner/manager shall issue a declaration stating: a) a commitment to continuously improve the sustainable forest management". PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1" PCSN II 6.2.2 "Management records shall be kept. Management records are an annual management report. These shall include a summary of any work done, information about the amount of timber and other forest products felled and sold, and any variations from the plan as a minimum requirement". Compliance: Conformity Justification: The Standard requires a forest owner/manager declaration (5.1), management plan (6.2.1) and management records (6.2.2). This constitutes fundamental documented information for effectiveness of the sustainable forest management.
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	YES	PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1" PCSN II 6.2.2 "Management records shall be kept. Management records are an annual management report. These shall include a summary of any work done, information about the amount of timber and other forest products felled and sold, and any variations from the plan as a minimum requirement". Compliance: Conformity Justification: The Standard (appendix 1) requires the content of the management plan and regular 10-years update. The management records shall be kept and be relevant to the forest management activities (6.2.2).

8. Operation		
8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle		
8.1.1 The standard requires that management shall aim to maintain or increase forests and their ecosystem services and maintain or enhance the economic, ecological, cultural and social values of forest resources.	YES	<p>PCSN I: "7.1.1 The owner/manager shall maintain the forested area. It is not possible to convert forest to alternative land use, including forest plantations, unless the conversion meets the following provisions...":</p> <p>Compliance: conformity</p> <p>Justification:</p> <p>The Standard does require to maintain forested area (7.1.1). Individual requirements of the standard ensure that the ecosystems services, economic, ecological, cultural and social values of forest resources are maintained or enhanced.</p>
8.1.2 The standard requires that the quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.	YES	<p>PCSN I: 7.1.3 Management activities shall encourage an action which has positive impacts on the climate, such as reducing greenhouse gas emissions or the efficient use of other raw materials.</p> <p>PCSN I: 7.3.4 The harvesting rate of (non-) wood products shall remain sustainable over the long term.</p> <p>PCSN I: "7.3.2 No branches or top wood will be removed, namely any tree parts above ground with a diameter of less than 8 centimetres at the thicker end. The removal of branches and top wood is permitted within landscape planting, urban areas and on mineral-rich soils (albeit not on podzol soils or limestone-poor sandy soils) or for ecological and/or cultural-historical reasons which have been justified in the management plan".</p> <p>"7.3.3 Leaf foliage and below-ground biomass shall not be removed".</p> <p>7.4.3 "Forest rejuvenation shall make use of tree species appropriate to the area where they will grow...".</p> <p>7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible shall the current share of native deciduous trees is more than 20%".</p> <p>PCSN I: "7.4.6 Certified property shall have at least 50% of its area as mixed forest. Where this proportion has not yet been reached, this will be included as an objective in the management plan, giving a maximum transition period of 20 years. If the current mix of the forest is above 50%, this shall be preserved where possible".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for maintaining the quality and quantity of forest resources by defining a sustainable harvest and requirements for forest regeneration and silviculture treatment promoting mixed forests.</p>
8.1.3 The standard requires that climate positive practices in management	YES	<p>PCSN I: "PCSN I: 7.1.3 Management activities shall encourage an action which has positive impacts on the</p>

operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged.		<p>climate, such as reducing greenhouse gas emissions or the efficient use of other raw materials”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for climate positive practices, including efficient use of resources and reduction of greenhouse gas emissions (7.1.3).</p>
8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:		
<p>a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with affected stakeholders; and</p>	NO	<p>PCSN I: “7.1.1 The owner/manager shall maintain the forested area. It is not possible to convert forest to alternative land use, including forest plantations, unless the conversion meets the following provisions:</p> <ul style="list-style-type: none"> a) The converted forest has been compensated b) this complies with national legislation and regulations; c) it is not in excess of 5% of forest in the certified area in minimal five years; d) has no adverse effects on ecologically important forest areas; culturally and socially significant areas, or other protected areas; e) does not damage any areas of significantly high carbon storage; f) will contribute towards management, the economy and social cohesion over the long term.”. <p>PCSN I, 3.5 (Definitions): “3.5 Compensation</p> <p>Any area which has been felled is considered to be compensated shall an area of the same size be replanted. Ideally, this will take place within the certified area, but otherwise clearly outside. The types which are replanted shall potentially have the same features as the types which have been felled. The replanted area shall also meet the requirements of this standard”.</p> <p>PCSN I, 3.11 (Definitions): “3.11 Forest plantation</p> <p>A forest with a regularly spaced, even-aged monoculture without undergrowth and whose sole purpose is the production of timber”.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The standard prohibits conversion of forest to non-forest use and to forest plantations unless in justified circumstances where compliance with legislation is stipulated as one of the conditions.</p> <p>The definition of the term “forest plantations” is broader (stricter) than the PEFC definition as is also covers “regularly spaced, even-aged monoculture without undergrowth”. The modification of the PEFC Council definition (PEFC ST 1003:2018) has been considered as complying with Note 3 of the definition of “forest plantation” (PEFC ST 1003:2018).</p> <p>The minor non-conformity has been assigned based on the fact that the PCSN requirements:</p> <ul style="list-style-type: none"> a) do not include stakeholders consultation as a part of the criteria for justified circumstances;

		b) do not allow forest plantations established by forest conversion (not covered by the justified circumstances) to be eligible for the PEFC certification (see Appendix 1 of PEFC ST 1003:2018).
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	NO	See requirement 8.1.4a above. Compliance: Minor non-conformity Justification: The criteria for justified circumstances of forest conversion include a scale of the conversion referring to 5 %. However, it refers to 5 % of certified area rather than “forest type within the forest area”. In addition, the 5 % conversion limit applies to a minimal period of 5 years. This means that every five years a 5 % of the area can be converted.
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	See requirement 8.1.4a above. Compliance: Conformity Justification: The criteria for justified circumstances cover negative impacts on “ecologically important forest areas, culturally and socially significant areas, or other protected areas” (7.1.1d).
d) does not destroy areas of significantly high carbon stock; and	YES	See requirement 8.1.4a above. Compliance: Conformity Justification: The criteria for justified circumstances cover protection of “high carbon stock” (7.1.1e).
e) makes a contribution to long-term conservation, economic, and social benefits.	YES	See requirement 8.1.4a above. Compliance: Conformity Justification: The criteria for justified circumstances cover a contribution to long-term conservation, economic, and social benefits (7.1.1f).
8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	YES	PCSN I: “7.1.4 Ecologically important non-forest areas shall not be converted to forest unless there are legitimate circumstances where conversion from non-forest area to forest is required: a) complies with legislation and regulations and forms part of national or regional planning; b) has been planned on the basis of a decision-making mechanism where the stakeholders have been given opportunities to participate; c) has no adverse impact on endangered non-forest areas, culturally and socially significant areas, important habitats of endangered species or other protected areas; d) involves no more than 5% of the ecologically important non-forest area;

		<p>e) has zero impact on areas of high carbon storage;</p> <p>f) contributes towards management, the economy and social cohesion over the long term".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (7.1.4).</p> <p>PCSN I does not allow certification of forest plantations (6). Therefore, forest plantations established by afforestation of ecologically important forest areas are not eligible for PEFC certification (See Appendix 1, PEFC ST 1003:2018).</p>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	YES	See 8.1.5a
c) does not have negative impacts on threatened (including vulnerable, rare or endangered) nonforest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and	YES	See 8.1.5a
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	YES	See 8.1.5a
e) does not destroy areas of significantly high carbon stock; and	YES	See 8.1.5a
f) makes a contribution to long-term conservation, economic, and social benefits.	YES	See 8.1.5a
8.1.6 The standard requires that if conversion of severely degraded forests to forest plantations is being considered, it must add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	N/A	<p>PCSN I does not define the requirement that would allow conversion of severely degraded forests.</p> <p>Compliance: Not applicable</p>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	N/A	<p>PCSN I does not define the requirement that would allow conversion of severely degraded forests.</p> <p>Compliance: Not applicable</p>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	N/A	<p>PCSN I does not define the requirement that would allow conversion of severely degraded forests.</p> <p>Compliance: Not applicable</p>

d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	N/A	PCSN I does not define the requirement that would allow conversion of severely degraded forests. Compliance: Not applicable
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	N/A	PCSN I does not define the requirement that would allow conversion of severely degraded forests. Compliance: Not applicable
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	N/A	PCSN I does not define the requirement that would allow conversion of severely degraded forests. Compliance: Not applicable
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	N/A	PCSN I does not define the requirement that would allow conversion of severely degraded forests. Compliance: Not applicable
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	N/A	PCSN I does not define the requirement that would allow conversion of severely degraded forests. Compliance: Not applicable
8.2 Criterion 2: Maintenance of forest ecosystem health and vitality		
8.2.1 The standard requires that health and vitality of forest ecosystems shall be maintained or enhanced and degraded forest ecosystems shall be rehabilitated wherever and as far as economically feasible, by making best use of natural structures and processes and using preventive biological measures.	YES	<p>PCSN I: 7.2.3 "Damage to permanent trees, shrubs and soil shall be avoided as much as possible while working.</p> <p>PCSN I: "7.4.2 Support shall be given to initiatives aimed at restoring, conserving or improving special (forest) ecosystems or populations of endangered animal and plant species, subject to financial constraints".</p> <p>PCSN I: "7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow.</p> <p>a) Rejuvenation shall be through natural regrowth, or through replanting...</p> <p>d) Less common or nationally rare native tree and shrub types and species/ecologically important forest areas within the certified property shall be identified, protected, managed or allowed open access".</p> <p>7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible shall the current share of native deciduous trees is more than 20%".</p> <p>7.4.6 "Certified property shall have at least 50% of its area as mixed forest. Where this proportion has not yet been reached, this will be included as an objective in the management plan, giving a maximum transition period of 20 years. If the current mix of the forest is above 50%, this shall be preserved where possible".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements relating to the forest health and vitality; avoiding damage to the standing trees and shrubs (7.2.3), promoting regeneration (7.4.3), promoting native species (7.4.4), mixed forests (7.4.6) and</p>

		dead wood (7.4.13) and restoration of forest ecosystems (7.4.2).
8.2.2 The standard requires that adequate genetic, species and structural diversity shall be encouraged or maintained to enhance the stability, vitality and resilience of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	YES	<p>PCSN I: 7.4.2 "Support shall be given to initiatives aimed at restoring, conserving or improving special (forest) ecosystems or populations of endangered animal and plant species, subject to financial constraints".</p> <p>PCSN I: "7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow.</p> <p>a) Rejuvenation shall be through natural regrowth, or through replanting.</p> <p>b) This shall only be permitted using plants appearing in the Dutch National Catalogue of Tree Varieties If replanting is chosen, meaning that their origin is known and the authenticity of the variety is guaranteed. It is permitted to deviate from the Dutch Catalogue of Tree Varieties to a limited extent within the context of climate-conscious forest management program.</p> <p>c) Genetically modified organisms or plant material shall not be used.</p> <p>d) Less common or nationally rare native tree and shrub types and species/ecologically important forest areas within the certified property shall be identified, protected, managed or allowed open access".</p> <p>7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible shall the current share of native deciduous trees is more than 20%".</p> <p>7.4.6 "Certified property shall have at least 50% of its area as mixed forest. Where this proportion has not yet been reached, this will be included as an objective in the management plan, giving a maximum transition period of 20 years. If the current mix of the forest is above 50%, this shall be preserved where possible".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires genetic (7.4.3), species (7.4.2, 7.4.3, 7.4.4) and structural diversity (7.4.2, 7.4.6).</p>
8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases adequate management and control measures shall be taken.	YES	<p>PCSN I: "7.2.5 The use of fire as a control method shall be restricted to areas where this method is essential for preserving certain types or habitats. Clear management objectives under such circumstances shall be outlined and adequate safety measures shall be put in place.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements restricting the use of fires in forest management (7.2.5).</p>
8.2.4 The standard requires that appropriate forest management practices such as reforestation and afforestation with tree species and provenances that are suited to the site conditions or the use of tending, harvesting and transport	YES	<p>PCSN I: "7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow.</p> <p>a) Rejuvenation shall be through natural regrowth, or through replanting.</p> <p>b) This shall only be permitted using plants appearing in the Dutch National Catalogue of Tree Varieties If</p>

<p>techniques that minimise tree and/or soil damages shall be applied.</p>		<p>replanting is chosen, meaning that their origin is known and the authenticity of the variety is guaranteed. It is permitted to deviate from the Dutch Catalogue of Tree Varieties to a limited extent within the context of climate-conscious forest management program.</p> <p>c) Genetically modified organisms or plant material shall not be used.</p> <p>d) Less common or nationally rare native tree and shrub types and species/ecologically important forest areas within the certified property shall be identified, protected, managed or allowed open access".</p> <p>7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible shall the current share of native deciduous trees is more than 20%".</p> <p>PCSN I: 7.2.3 "Damage to permanent trees, shrubs and soil shall be avoided as much as possible while working.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for usage of site suited species in reforestation and afforestation (7.4.3) and minimisation of damages to trees and to the forest cover (7.2.3).</p>
<p>8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.</p>	<p>YES</p>	<p>PCSN I: "7.2.4 Only biodegradable fuels, oils and lubricants shall be used, provided this is possible from a technical perspective. Any non-biodegradable fuels will be collected, stored in designated locations and disposed of in an environmentally friendly manner. Any leakage of oil or fuel during management work shall be avoided as much as possible. Emergency procedures will be in place for minimising the risk of any damage to the environment caused by accidental spillage."</p> <p>PCSN I: 7.5.6 "Disposing of waste in the forest shall be avoided as much as possible.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Standard includes requirements for disposal of waste, (7.5.6), and for avoidance of spillage of oil or fuel (7.2.4).</p> <p>However, the wording to the requirement for the waste disposal (7.5.6) is ambiguous ("as much as possible") and does not ensure that the waste disposal on the forest land is strictly prohibited.</p>
<p>8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.</p>	<p>YES</p>	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:</p> <p>a) Herbs and grass are not controlled using these substances.</p> <p>b) No insecticides are used unless required on the grounds of public health.</p> <p>c) Any unwanted woody vegetation may be controlled using these substances in accordance with the instructions for use.</p>

		<p>d) Only crop protection substances or biocides as permitted by the Ctgb (www.ctgb-wageningen.nl) may be used. The use of pesticides classified in World Health Organisation Classes 1A and 1B is not permitted unless no viable alternative is available.</p> <p>e) If pesticides are used, this shall be recorded.</p> <p>f) Pesticides based on chlorinated hydrocarbons are not permitted, as they are non-biodegradable and therefore end up in the food chain.</p> <p>g) These activities shall be carried out in accordance with the Forests and Nature Health and Safety at Work Manual, and the Working Conditions Act".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for minimisation of the pesticides usage (7.2.1.).</p>
8.2.7 The standard requires that any use of pesticides is documented.	YES	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:...</p> <p>e) If pesticides are used, this shall be recorded.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for records on the pesticides usage (7.2.1e).</p>
8.2.8 The standard requires that the WHO Class 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available. Any exception to the usage of WHO Class 1A and 1B pesticides shall be defined in the national/regional standard.	NO	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:</p> <p>d) Only crop protection substances or biocides as permitted by the Ctgb (www.ctgb-wageningen.nl) may be used. The use of pesticides classified in World Health Organisation Classes 1A and 1B is not permitted unless no viable alternative is available.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Standard includes prohibition of the use of pesticides WHO 1A and 1B class with an exemption clause (7.2.1.).</p> <p>However, the minor non-conformity was assigned as the PEFC requirements states that the derogated substances shall be defined by the national standard.</p> <p>PEFC Netherlands argues that a list of "derogated substances" has been added to PCSN IX. However, the amended version of PCSN IX has not been submitted.</p>
<p>8.2.9 The standard requires that pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.</p> <p>Note: "Pesticides banned by international agreements" are defined in the Stockholm Convention on Persistent Organic Pollutants.</p>	YES	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:</p> <p>d) Only crop protection substances or biocides as permitted by the Ctgb (www.ctgb-wageningen.nl) may be used. The use of pesticides classified in World Health Organisation Classes 1A and 1B is not permitted unless no viable alternative is available</p>

		<p>f) Pesticides based on chlorinated hydrocarbons are not permitted, as they are non-biodegradable and therefore end up in the food chain.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits the use of chlorinated hydrocarbons. However, the standard does not prohibit pesticides banned by an international agreement.</p> <p>However, the reference to the Ctgb permission (a formal Dutch authority) ensures that no substances banned by the international agreements are included. See https://toelatingen.ctgb.nl/nl/authorisations.</p>
8.2.10 The standard requires that the use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment by trained personnel.	YES	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:</p> <p>g) These activities shall be carried out in accordance with the Forests and Nature Health and Safety at Work Manual, and the Working Conditions Act".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for proper use and proper equipment for the pesticides usage (7.2.1.).</p>
8.2.11 The standard requires that where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertilizer use shall not be an alternative to appropriate soil nutrient management.	YES	<p>PCSN I: 7.2.2 "Soil will only be fertilized following advice from an expert from an independent research institute. This is given on the basis of any symptoms of declining fertility, where it can be shown that the vitality of types found in the planted area has declined due to external influences, and that it is necessary to improve the vitality of the managed area by applying fertilizer. Fertilizers shall not be used as an alternative to appropriate soil nutrient management".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires controlled use of fertilisers and prohibits the fertilisers to be used as an alternative to soil nutrient management (7.2.2).</p>
8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)		
8.3.1 The standard requires that the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis shall be maintained.	YES	<p>PCSN I: 7.3.1 "The objective is both to safeguard and promote the production and marketing of a wide variety of both timber and non-timber products and services in accordance with the objectives set out in the management plan".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements to maintain production capability of forests (7.3.1).</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<p>PCSN I, 7.6.7: "The owner/manager strives towards a healthy economic situation, being open to new market possibilities as well as other economic activities".</p> <p>Compliance: Conformity</p> <p>Justification:</p>

		The Standard includes requirements for sound economic performance, consideration of new markets and economic activities (7.6.7).
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	YES	<p>PCSN I: 7.5.1 "Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion".</p> <p>PCSN I: 7.5.2 "Natural watercourses, fens, brooks, streams and their banks located in the forest shall be preserved or restored in terms of both quality and quantity. Eutrophication of these waters shall be avoided".</p> <p>PCSN I: 7.2.3 "Damage to permanent trees, shrubs and soil shall be avoided as much as possible while working".</p> <p>PCSN I: 7.4.3 "Forest rejuvenation shall make use of tree species appropriate to the area where they will grow. a) Rejuvenation shall be through natural regrowth, or through replanting".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that forest operation shall not reduce the productive capacity (7.4.3) and shall not damage soil (7.5.1), water (7.5.2) and remaining vegetation (7.2.3).</p>
8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	YES	<p>PCSN I: 7.3.4 "The harvesting rate of (non-) wood products shall remain sustainable over the long term".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a long-term sustainability of wood and non-wood forest products harvesting (7.3.4).</p>
8.3.5 The standard requires that adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.	YES	<p>PCSN I: 7.3.5 There shall be an adequate network of work roads, skid roads and access routes. a) Laying tracks and soil compression shall be avoided as far as possible by, for example:</p> <ul style="list-style-type: none"> - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling shall adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage. <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil.</p> <p>c) The infrastructure shall be designed in such a way so that as little damage as possible is caused to ecologically important forest areas, and that consideration is given to (migration patterns of) protected types and cultural and historical elements (see Careful Forest Management</p>

		<p>Checklist, from the Code of Conduct for Forest Management).”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for building forest infrastructure with minimisation of impacts on the environment and proper transportation/skidding operations (7.3.5)</p>
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
<p>8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.</p>	YES	<p>PCSN I: 7.4.2 “Support shall be given to initiatives aimed at restoring, conserving or improving special (forest) ecosystems or populations of endangered animal and plant species, subject to financial constraints”.</p> <p>PCSN I: “7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow.</p> <p>a) Rejuvenation shall be through natural regrowth, or through replanting.</p> <p>b) This shall only be permitted using plants appearing in the Dutch National Catalogue of Tree Varieties If replanting is chosen, meaning that their origin is known and the authenticity of the variety is guaranteed. It is permitted to deviate from the Dutch Catalogue of Tree Varieties to a limited extent within the context of climate-conscious forest management program.</p> <p>c) Genetically modified organisms or plant material shall not be used.</p> <p>d) Less common or nationally rare native tree and shrub types and species/ecologically important forest areas within the certified property shall be identified, protected, managed or allowed open access”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for conservation, maintenance and enhancement of biodiversity at different levels (7.4.2, 7.4.3).</p>
<p>8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas.</p> <p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p>	YES	<p>PCSN I: “7.4.1 The owner/manager shall identify, protect, manage or cordon off ecologically important forest areas”.</p> <p>PCSN I: “3.6 Ecologically important forest areas Forest areas which have been granted special status through legislation and regulation (Natura2000), and forestry reserves and A-locations”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify and protect ecologically important forest areas. The definition of this term refers to areas that are defined by regulations (natura 2000), forestry reserves and A-locations (7.4.1) and cover all four bullet points of the PEFC Council’s definition of the ecologically important forest areas (PEFC ST 1003:2018, 3.5).</p> <p>Natura2000 areas (following the European and Dutch legislation) cover forest areas with</p>

		<p>e) protected, rare, sensitive or representative ecosystems;</p> <p>f) habitats of protected and threatened species,</p> <p>g) endangered or protected genetic resources,</p> <p>h) potential to contribute to landscape diversity and are typical example of 9 European biographical zones.</p> <p>A-location forests are (https://edepot.wur.nl/367836): The forest consists only of endemic species,</p> <p>d) 2. It consists of spontaneous forest or uneven-aged forest with old trees and a management that leaves room for spontaneous development. (3.5 a and 3.5 d)</p> <p>e) 3. It occurs on a location that was already forested in 1850, this criterion does not, however, apply to the mixed forests and pine wood communities on former shifting sands (3.5 d)</p> <p>f) 4. The forest shall preferably be on undisturbed ground with a natural relief, where no digging or trenching has been taken place.</p> <p>Forest reserves are defined as selected parts of forest areas, reserved for the purpose of gaining knowledge through observation, research and education on spontaneous (i.e. not influenced by man) natural processes.</p> <p>(https://edepot.wur.nl/36274#:~:text=Bijlsma%2C%20R.J.%2C%202008.,Alterra%2C%20Alterra%2Drapport%201680.&text=Het%20rapport%20zal%20worden%20gebruikt,monitoring%20en%20onderzoek%20in%20bosreservaten.).</p>
<p>8.4.3 The standard requires that protected, threatened and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p> <p>Note: The requirement does not preclude trade according to CITES requirements.</p>	YES	<p>PCSN I: 7.4.2 "Support shall be given to initiatives aimed at restoring, conserving or improving special (forest) ecosystems or populations of endangered animal and plant species, subject to financial constraints".</p> <p>PCSN I: 7.4.7 The Forest Management Code of Conduct and/or the Flora and Fauna Management and Maintenance Code of Conduct shall be followed at all times.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to protect endangered and threatened species and their habitats. This practically excludes any commercial use of the endangered and protected species (7.4.2, 7.4.7).</p>
<p>8.4.4 The standard requires that successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources.</p>	YES	<p>PCSN I: "7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow. a) Rejuvenation shall be through natural regrowth, or through replanting..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for successful regeneration, being either natural regeneration or planting (7.4.3).</p>
<p>8.4.5 The standard requires that for reforestation and afforestation origins of native species that are well-adapted to site</p>	YES	<p>PCSN I: "7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow.</p>

<p>conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised.</p> <p>Note: CBD (Convention on Biological Diversity) Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as guidance for avoidance of invasive species.</p>		<p>a) Rejuvenation shall be through natural regrowth, or through replanting.</p> <p>b) This shall only be permitted using plants appearing in the Dutch National Catalogue of Tree Varieties If replanting is chosen, meaning that their origin is known and the authenticity of the variety is guaranteed. It is permitted to deviate from the Dutch Catalogue of Tree Varieties to a limited extent within the context of climate-conscious forest management program.</p> <p>c) Genetically modified organisms or plant material shall not be used.</p> <p>d) Less common or nationally rare native tree and shrub types and species/ecologically important forest areas within the certified property shall be identified, protected, managed or allowed open access."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for the usage of species that are included in the Dutch National Catalogue of Tree Varieties (7.4.3). The catalogue is maintained by the Board for Plant Varieties (https://www.raadvoorplantenrassen.nl/en/about-the-board/).</p> <p>The catalogue does include introduced species but they were and are scientifically evaluated before added to the list. Newly added species are being evaluated by the Centre for Genetic Sources, which is part of the Wageningen University and Research Centre: https://www.wur.nl/nl/Onderzoek-Resultaten/Wettelijke-Onderzoekstaken/Centrum-voor-Genetische-Bronnen-Nederland-1.htm</p> <p>More information can be found on: https://www.rassenlijstbomen.nl/nl/Home.htm</p>
<p>8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	YES	<p>PCSN I: 7.4.5 Afforestation, reforestation and other forest planting activities which contribute towards improving and restoring ecological corridors shall be encouraged."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to planting activities shall restore the ecological connectivity (7.4.5).</p>
<p>8.4.7 The standard requires that genetically-modified trees shall not be used.</p> <p>Note: The restriction on the usage of genetically-modified trees has been adopted by the PEFC General Assembly based on the Precautionary Principle. Until enough scientific data on genetically modified trees indicates that impacts on human and animal health and the environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used.</p>	YES	<p>PCSN I: "7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow... c) Genetically modified organisms or plant material shall not be used..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires prohibition of the GMO material in planting.</p>

<p>8.4.8 The standard requires that a diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.</p>	<p>YES</p>	<p>PCSN I: 7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible shall the current share of native deciduous trees is more than 20%".</p> <p>PCSN I: "7.4.6 Certified property shall have at least 50% of its area as mixed forest. Where this proportion has not yet been reached, this will be included as an objective in the management plan, giving a maximum transition period of 20 years. If the current mix of the forest is above 50%, this shall be preserved where possible".</p> <p>PCSN I: 7.4.13 "Any clearing areas shall not exceed 2 hectares in principle, unless the purpose and need for a larger clearing area are justified in the management plan and are backed up by an independent expert".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting horizontal and vertical diversity of forest stands by 20 % threshold of native deciduous species (7.4.4), 50 % threshold of mixed forests *7.4.6) and 2ha maximum of clearcuts.</p>
<p>8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.</p>	<p>YES</p>	<p>PCSN I: "7.4.1 The owner/manager shall identify, protect, manage or cordon off ecologically important forest areas".</p> <p>PCSN I: "7.4.3 Forest rejuvenation shall make use of tree species appropriate to the area where they will grow.</p> <p>d) Less common or nationally rare native tree and shrub types and species/ecologically important forest areas within the certified property shall be identified, protected, managed or allowed open access".</p> <p>PCSN I: "7.4.8 Any work shall be carried out in a manner as instructed for that location in ecologically important forest areas".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for protection of valuable ecosystems regardless of whether they were created by traditional management systems or natural succession (7.4.1, 7.4.3, 7.4.8).</p>
<p>8.4.10 The standard requires that tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to maintain or improve biological diversity.</p>	<p>YES</p>	<p>PCSN I: "7.4.7 The Forest Management Code of Conduct and/or the Flora and Fauna Management and Maintenance Code of Conduct shall be followed at all times".</p> <p>PCSN I: "7.2.3 Damage to permanent trees, shrubs and soil shall be avoided as much as possible while working".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for compliance with the Code of Conducts that cover the area of reducing negative impacts of forest operations (7.4.7) and requires avoidance of damages to the remaining vegetation. (7.2.3).</p>

<p>8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.</p>	<p>YES</p>	<p>PCSN I: 7.3.5 There shall be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression shall be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling shall adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p> <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil.</p> <p>c) The infrastructure shall be designed in such a way so that as little damage as possible is caused to ecologically important forest areas, and that consideration is given to (migration patterns of) protected types and cultural/historical elements (see Careful Forest Management Checklist, from the Code of Conduct for Forest Management).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements building and maintaining forest infrastructure, and minimisation of its negative impacts on biodiversity (7.3.5).</p>
<p>8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to control the pressure of animal populations on forest regeneration and growth as well as on biodiversity.</p>	<p>YES</p>	<p>PCSN I: 7.4.9 “There shall be no livestock grazing in the forest. Extensive natural grazing, supported by a well-documented development process may be an option provided that any rejuvenation of the forest and therefore the long-term survival is not under threat”.</p> <p>PCSN I: “7.4.10 The owner/manager shall make every effort to achieve a wildlife population such that the rejuvenation of the forest, in particular the rejuvenation of native deciduous trees, can develop naturally”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for control of damages caused by animal population both grazing by domestic animals (7.4.9) and by wildlife population (7.4.10), especially in reforestation and afforestation.</p>
<p>8.4.13 The standard requires that standing and fallen dead wood, hollow trees, old groves and rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.</p>	<p>YES</p>	<p>PCSN I: 7.4.11 “There shall be on average 6 m³ of large, dead trees per hectare. These will be native trees wherever possible. This will be included as an objective in the management plan, citing a transition period shall this quantity have not yet been reached. This criterion shall not apply where:</p> <p>a) it poses safety issues for forest visitors and/or traffic;</p> <p>b) it is not appropriate for the development phase of the forest or there are not enough large trees in the forest area in question for other reasons”.</p>

		<p>7.4.12 "Existing hollow trees and trees where birds are nesting shall be preserved, unless this is not possible for safety reasons".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for dead wood with specific threshold of 6 m³ per ha (7.4.11), hollow trees and birds' nesting trees (7.4.12).</p>
8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)		
8.5.1 The standard requires that protective functions of forests for society, such as their potential role in erosion control, flood prevention, water purification, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.	YES	<p>PCSN I: 7.1.3 "Management activities shall encourage an action which has positive impacts on the climate, such as reducing greenhouse gas emissions or the efficient use of other raw materials".</p> <p>PCSN I: 7.5.1 "Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion".</p> <p>7.5.2 "Natural watercourses, fens, brooks, streams and their banks located in the forest shall be preserved or restored in terms of both quality and quantity. Eutrophication of these waters shall be avoided".</p> <p>PCSN I: 7.5.3 "The groundwater system shall be protected or restored to the extent where this is possible within the forest owner's capabilities".</p> <p>PCSN I: "7.5.4 "Working and mulching the forest floor shall be restricted as much as possible and shall be limited to vegetation and humus layers".</p> <p>PCSN I: 7.5.5 "Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for protection of sites with protective functions for society, including identification of such forests, planning and implementing appropriate measure and management in unfavourable forest sites (7.5.1-7.5.5).</p>
8.5.2 The standard requires that areas that fulfil specific and recognised protective functions for society shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions.	YES	<p>PCSN I: Appendix 1: "A number of (map) attachments form part of the management plan: ... b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams... "</p> <p>PCSN I: 7.5.1 "Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion".</p> <p>PCSN I: 7.5.5 "Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an</p>

		<p>influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained”.</p> <p>PCSN I 7.3.5 “There shall be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression shall be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling shall adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p> <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for identification and mapping of forests with protective functions in management plans (Appendix 1), including measures to maintain or enhance those functions (7.5.1, 7.3.5, 7.5.5).</p>
<p>8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.</p>	YES	<p>PCSN I: 7.5.1 “Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion”.</p> <p>PCSN I: 7.5.5 “Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained”.</p> <p>PCSN I 7.3.5 “There shall be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression shall be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling shall adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p> <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil”.</p> <p>PCSN I: 7.4.9 “There shall be no livestock grazing in the forest. Extensive natural grazing, supported by a well-documented development process may be an option</p>

		<p>provided that any rejuvenation of the forest and therefore the long-term survival is not under threat".</p> <p>7.4.10 "The owner/manager shall make every effort to achieve a wildlife population such that the rejuvenation of the forest, in particular the rejuvenation of native deciduous trees, can develop naturally".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for protection of soil against erosion in forest management as well as infrastructure building and maintenance (7.5.1, 7.5.3, 7.3.5) and minimising of pressure of animal population (7.4.10, 7.4.9).</p>
<p>8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations.</p>	YES	<p>PCSN I: Appendix 1: "A number of (map) attachments form part of the management plan: ... b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams... "</p> <p>PCSN I: 7.5.2 "Natural watercourses, fens, brooks, streams and their banks located in the forest shall be preserved or restored in terms of both quality and quantity. Eutrophication of these waters shall be avoided".</p> <p>PCSN I: 7.5.3 "The groundwater system shall be protected or restored to the extent where this is possible within the forest owner's capabilities".</p> <p>PCSN I: "7.5.4 "Working and mulching the forest floor shall be restricted as much as possible and shall be limited to vegetation and humus layers".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for water protection, their mapping (Appendix 1) and protection (7.5.2, 7.5.3).</p>
<p>8.5.5 The standard requires that construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>	YES	<p>PCSN I: 7.5.5 "Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained".</p> <p>PCSN I 7.3.5 "There shall be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression shall be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling shall adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p>

		<p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil</p> <p>c) The infrastructure shall be designed in such a way so that as little damage as possible is caused to ecologically important forest areas, and that consideration is given to (migration patterns of) protected types and cultural/historical elements (see Careful Forest Management Checklist, from the Code of Conduct for Forest Management).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for forest infrastructure and its impacts on soil and water (7.5.5, 7.3.5).</p>
8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions		
8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests.	YES	<p>PCSN I: 1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto:</p> <p>i) any sites of historically archaeological, cultural or spiritual importance present</p> <p>j) the level of public access</p> <p>5. Attachments to the management plan</p> <p>b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance".</p> <p>PCSN I: 7.6.1 "The forest shall be open and at least be accessible for recreational purposes on foot via the existing paths and roads. Restrictions to access areas shall be permitted in order to protect privacy and personal surroundings, to protect special plants, animals or habitats and other special elements such as archaeological monuments, for the safety of visitors and workers, and for wildlife refuge areas".</p> <p>PCSN I: 7.6.2 "Sites and elements of special archaeological, historical, cultural or spiritual value shall be protected".</p> <p>PCSN I: 7.6.3 "Relevant knowledge and scientific insight regarding the forest area supplied by third parties shall be included in the monitoring and review cycle (Appendix 1)".</p> <p>PCSN I: 7.6.5 "Anyone in possession of documents of ownership and usage rights shall be involved in the drafting of the management plan".</p> <p>PCSN I: 7.6.6 "The owner/manager shall be open to contributing towards scientific research on sustainable forest management".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements to respect socio-economic functions of forests (7.6.1-7.6.6). Those are also supported by the requirements for the content of the management plan (Appendix 1).</p>

<p>8.6.2 The standard requires that adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.</p>	<p>YES</p>	<p>PCSN I: 7.6.1 “The forest shall be open and at least be accessible for recreational purposes on foot via the existing paths and roads. Restrictions to access areas shall be permitted in order to protect privacy and personal surroundings, to protect special plants, animals or habitats and other special elements such as archaeological monuments, for the safety of visitors and workers, and for wildlife refuge areas”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard ensure public access to forests and defines cases where the public access can be restricted (7.6.1).</p>
<p>8.6.3 The standard requires that sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of indigenous peoples and local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.</p>	<p>YES</p>	<p>PCSN I: 7.6.2 “Sites and elements of special archaeological, historical, cultural or spiritual value shall be protected”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires protection of sites with historical, spiritual and cultural significance (7.6.2).</p>
<p>8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples.</p>	<p>N/A</p>	<p>PCSN I: 5.4 “The owner/manager communicates with the stakeholders, and explains the objectives and management plan.”.</p> <p>PCSN I: 7.6.5 “Anyone in possession of documents of ownership and usage rights shall be involved in the drafting of the management plan”.</p> <p>PCSN I: 7.6.1 “The forest shall be open and at least be accessible for recreational purposes on foot via the existing paths and roads. Restrictions to access areas shall be permitted in order to protect privacy and personal surroundings, to protect special plants, animals or habitats and other special elements such as archaeological monuments, for the safety of visitors and workers, and for wildlife refuge areas”.</p> <p>PCSN I: 7.6.2 “Sites and elements of special archaeological, historical, cultural or spiritual value shall be protected”.</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Standard includes requirements supporting local communities, relating to recreation and access to forests (7.6.5), protecting sites of cultural / spiritual importance (7.6.2). The standard also requires to communicate to local stakeholders (5.4) and include those with user’s rights in the management planning (7.6.5).</p> <p>The requirement of ensuring health and well-being of local populations is not relevant to the conditions of the Netherlands as this is the primary role of the government to provide education, health-care, infrastructure, social safety and security, etc.</p> <p>All those society functions are sufficiently covered by the Government as for example demonstrated by the World Happiness report, an independent research report undertaken for the United Nations that takes Health and well-being into account and where the Netherlands ranks</p>

		amongst the 5 top countries: https://happiness-report.s3.amazonaws.com/2021/WHR+21.pdf
8.6.5 The standard requires that the best use shall be made of forest-related experience and traditional knowledge, innovations and practices such as those of forest owners, NGOs, local communities, and indigenous peoples. Equitable sharing of the benefits arising from the utilization of such knowledge shall be encouraged.	YES	<p>PCSN I: 5.4 "The owner/manager communicates with the stakeholders, and explains the objectives and management plan".</p> <p>PCSN I: 7.6.5 "Anyone in possession of documents of ownership and usage rights shall be involved in the drafting of the management plan".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard only requires communication with stakeholders (5.4) and involvement of those who have user's right in the management planning (7.6.5).</p> <p>Taking into account the fact that forest-related knowledge, including traditional management systems, is widely available and accessible to forest owners / manager (through education and training), the wording of the Standard is sufficient.</p>
8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples.	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>Within the Dutch conditions, it is not the role or responsibility of the forest owner to stimulate the local economy through training and employment of local people. That role is guaranteed by the government who provides for economic development of rural areas. The efficiency of the governmental work and economic development is the demonstrated situation does not mean he is not contributing to the local economy or does not hire local people to work in the forest, but it is not his obligation to do so. That role is again taken by the government who provides for a strong economic situation proved by a high employment rate of around 78%, being top 3 of the OECD countries: https://www.statista.com/statistics/268127/employment-rate-in-selected-industrialized-countries/, and a high GDP position: https://en.wikipedia.org/wiki/List_of_countries_by_GDP_(nominal).</p>
8.6.7 The standard requires that forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.	YES	<p>PCSN I: 7.6.6 "The owner/manager shall be open to contributing towards scientific research on sustainable forest management".</p> <p>PCSN I: "7.6.3 Relevant knowledge and scientific insight regarding the forest area supplied by third parties shall be included in the monitoring and review cycle (Appendix 1)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting research activities (7.6.6) and for usage of the scientific knowledge (7.6.3).</p>
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		

<p>9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.</p>	<p>YES</p>	<p>PCSN I, 8.1.1: "The owner shall monitor his area on ecological, social and economic effects. The results of this monitoring will be used in the planning".</p> <p>PCSN I: Appendix 1:</p> <p>"6. Monitoring and Review: All elements shall be subject to review, with the exception of section 5. Management plan attachments</p> <p>The management plan shall be reviewed and updated every ten years.</p> <p>There shall be interim reviews following natural disasters (storm, fire, disease, plague)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring of forest resources and review as an integral part of the 10-years planning process (8.1.1, Appendix 1).</p>
<p>9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>	<p>YES</p>	<p>PCSN I, 8.1.2: "The owner shall regularly monitor the health of the certificated area, especially on biotic and abiotic factors that could influence the health and vitality of the ecosystem. One can think of pests, diseases, grazing, fire and harm caused by environment factors, air population or management activities".</p> <p>PCSN I: Appendix 1:</p> <p>"6. Monitoring and Review: All elements shall be subject to review, with the exception of section 5. Management plan attachments</p> <p>The management plan shall be reviewed and updated every ten years.</p> <p>There shall be interim reviews following natural disasters (storm, fire, disease, plague)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring and review of forest resources as a part of the management planning (10 years) and monitoring of forest health (8.1.2, Appendix 1).</p>
<p>9.1.3 The standard requires that where it is the responsibility of the forest owner/manager and included in forest management, the use of non-wood forest products, including hunting and fishing, shall be regulated, monitored and controlled.</p>	<p>YES</p>	<p>PCSN I, 8.1.3: "Where applicable, the owner will regulate, monitor and control the use of non-forest products, such as the sale of game".</p> <p>PCSN I: Appendix 1:</p> <p>"6. Monitoring and Review: All elements shall be subject to review, with the exception of section 5. Management plan attachments</p> <p>The management plan shall be reviewed and updated every ten years.</p> <p>There shall be interim reviews following natural disasters (storm, fire, disease, plague)".</p> <p>Compliance: Conformity</p> <p>Justification:</p>

		Both wood and non-wood production are subject to the management planning and as such are also subject to the monitoring and review (8.1.3, Appendix 1).
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	<p>PCSN I: 6.3.2.1: "Safety regulations have been adopted and personal protective equipment is used in accordance with the Forests and Nature Health and Safety at Work Manual. The forest owner shall provide instructions and ensure that his/her own employees, volunteers and private timber buyers comply with them".</p> <p>PCSN I, 8.1.4: "The owner shall regularly monitor the working conditions and adjust them if necessary".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The monitoring of working conditions is delivered through requirement 8.1.4 as well as by adherence to the Forests and Nature Health and Safety at Work Manual (https://www.stigas.nl/agroarbo/bos-en-natuur) that also requires regular monitoring of the working conditions and provides Checklists for those tasks.</p>
9.2 Internal audit		
9.2.1 Objectives		
The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system		
<p>a) conforms to</p> <ul style="list-style-type: none"> • the organisation's requirements for its management system; • the requirements of the national sustainable forest management standard 	YES	<p>PCSN I: "8.2.1 Objectives</p> <p>The owner shall organise an internal audit at least once a year, during which information will be provided as to whether the management system:</p> <p>(a) Complies with:</p> <ul style="list-style-type: none"> - The requirements set by the owner for its management system - The requirements of PCSN I <p>b) Is implemented and managed in an effective manner".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
<p>b) is effectively implemented and maintained.</p>	YES	<p>PCSN I: "8.2.1 Objectives</p> <p>The owner shall organise an internal audit at least once a year, during which information will be provided as to whether the management system:</p> <p>(a) Complies with:</p> <ul style="list-style-type: none"> - The requirements set by the owner for its management system - The requirements of PCSN I <p>b) Is implemented and managed in an effective manner".</p> <p>Compliance: Conformity</p> <p>Justification:</p>

		The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirement.
9.2.2 Organisation The standard requires that the organisation shall:		
a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	YES	PCSN I: "8.2.2 Organisation of the internal audit The owner shall: a) Implement an audit programme that includes the frequency, methods, responsibilities, planning and reporting, the importance of internal processes and the results of previous audits. b) define the audit criteria and scope for each audit c) Select auditors to carry out the audits taking into account objectivity and impartiality d) Ensuring that the results of the audits are shared with relevant management e) Retain documented information of the audit results as evidence of the implementation of the audit programme". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.
b) define the audit criteria and scope for each audit;	YES	PCSN I: "8.2.2 Organisation of the internal audit The owner shall: ... b) define the audit criteria and scope for each audit". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	YES	PCSN I: "8.2.2 Organisation of the internal audit The owner shall: ... c) Select auditors to carry out the audits taking into account objectivity and impartiality". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.
d) ensure that the results of the audits are reported to relevant management;	YES	PCSN I: "8.2.2 Organisation of the internal audit The owner shall: ... d) Ensuring that the results of the audits are shared with relevant management". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.

e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	<p>PCSN I: "8.2.2 Organisation of the internal audit The owner shall:...</p> <p>e) Retain documented information of the audit results as evidence of the implementation of the audit programme".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
9.3 Management review		
9.3.1 The standard requires that an annual management review shall at least include		
a) the status of actions from previous management reviews;	YES	<p>PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include:</p> <p>a) Action points from previous management reviews;</p> <p>b) changes in internal or external processes relevant to the management system;</p> <p>c) Information on the owner's performance. In any case, trends will be included:</p> <ul style="list-style-type: none"> - Deviations and solutions - The results of monitoring - The results of audits <p>(d) Opportunities for continuous improvement".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.</p>
b) changes in external and internal issues that are relevant to the management system;	YES	<p>PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include:...</p> <p>b) changes in internal or external processes relevant to the management system".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.</p>
<p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> • nonconformities and corrective actions; • monitoring and measurement results; • audit results; 	YES	<p>PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include..."</p> <p>c) Information on the owner's performance. In any case, trends will be included:</p> <ul style="list-style-type: none"> - Deviations and solutions - The results of monitoring - The results of audits". <p>Compliance: Conformity</p> <p>Justification:</p>

		The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.
d) opportunities for continual improvement	YES	<p>PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include:...</p> <p>(d) Opportunities for continuous improvement".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.</p>
9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.	YES	<p>PCSN II: "8.3.2 The results of the management review shall include decisions that allow for continuous improvements and possible changes of the management system".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.</p>
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	YES	<p>PCSN II: "8.3.3 The owner shall retain documented information to prove that a management review has been carried out".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.</p>
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
<p>a) react to the nonconformity and, as applicable:</p> <p>i. take action to control and correct it;</p> <p>ii. deal with the consequences;</p>	YES	<p>PCSN I: "9.1.1 When an anomaly is detected, the owner shall:</p> <p>(a) Respond and, where applicable</p> <p>i. Take action to resolve the deviation</p> <p>ii. Deal with the consequences</p> <p>b) Assess whether any action is required to resolve specific causes of the non-compliance so that it does not occur again. The owner does this by:</p> <p>i. Assessing the deviation</p> <p>ii. Determining the causes of the deviation</p> <p>iii. Determine whether similar deviations exist or may arise;</p> <p>c) Assess the effectiveness of any corrective action taken</p> <p>d) Make changes in the management system as required".</p>

		Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements. Observation The document is inconsistently using the terms for “non-conformities” as it uses in chapter 9.1.1 terms “deviations” or “anomaly”
b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: i. reviewing the nonconformity; ii. determining the causes of the nonconformity; iii. determining if similar nonconformities exist, or could potentially occur;	YES	PCSN I: “9.1.1 When an anomaly is detected, the owner shall:… b) Assess whether any action is required to resolve specific causes of the non-compliance so that it does not occur again. The owner does this by: i. Assessing the deviation ii. Determining the causes of the deviation iii. Determine whether similar deviations exist or may arise;…”. Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.
c) implement any action needed;	YES	PCSN I: “9.1.1 When an anomaly is detected, the owner shall: (a) Respond and, where applicable i. Take action to resolve the deviation ii. Deal with the consequences”. Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.
d) review the effectiveness of any corrective action taken;	YES	PCSN I: “9.1.1 When an anomaly is detected, the owner shall: … c) Assess the effectiveness of any corrective action taken”. Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.
e) make changes to the management system, if necessary.	YES	PCSN I: “9.1.1 When an anomaly is detected, the owner shall:…

		<p>d) Make changes in the management system as required”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	<p>PCSN I: “The actions taken by the owner to resolve the nonconformities shall be appropriate”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
10.1.3 The standard requires that the organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	<p>PCSN I: “9.1.3 The owner shall retain documented information as evidence of:</p> <p>(a) The nature of the deviation and the actions taken as a result</p> <p>(b) the results of the resolution.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
b) the results of any corrective action.	YES	<p>PCSN I: “9.1.3 The owner shall retain documented information as evidence of:</p> <p>(a) The nature of the deviation and the actions taken as a result</p> <p>(b) the results of the resolution.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
<p>10.2 Continual improvement</p> <p>The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.</p>	YES	<p>PCSN I: “9.2 The applicability, adequacy, and effectiveness of the management system and the sustainable management of the forest and/or the trees shall be continually improved”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for continuous improvement.</p>

Annex D: Detailed assessment of the Trees outside Forests (ToF) standard

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
Context of the national standard and the organisations applying a PEFC endorsed standard		
4.1 General The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall:		
a) include management and performance requirements that are applicable at the forest management unit level, or at another level as appropriate, to ensure that the intent of all requirements is achieved at the forest management unit level; Note: An example of a situation where a requirement can be defined as being at another level (e.g. group/regional) is monitoring of forest health. Through monitoring of forest health at regional level, and communicating of results at the FMU level, the objective of the requirement is met without the necessity to carry out the individual monitoring of each forest management unit.	YES	PCSN I: The Standard defines requirements that are applicable at the management unit level. Compliance: Conformity Justification: The standard includes requirements for the management unit level, both management system (planning, monitoring, etc.) as well as performance-based requirements.
b) be clear, performance based and auditable;	YES	Compliance: Conformity Justification: The standard includes requirements that are clear, performance/based and auditable.
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	YES	PCSN I, Scope: "It is intended for several types of users: - Forest owners: the standard for forest owners includes the requirements and guidelines they shall follow to obtain PEFC certification for sustainable forest management. - Owners or managers of Trees outside Forests (TOF) areas. This standard includes specific requirements and guidelines which TOF owners or managers shall follow in order to obtain PEFC certification. - Certification bodies & group managers: the standard includes requirements for certification bodies and group managers, on which management levels of individual forest owners are assessed.. PCSN I: 7.6.4 "Any companies used for work in the forest shall meet the following conditions: - the contractor is aware of the content of this standard and will work in accordance therewith. Compliance: Conformity Justification: All requirements of the standard apply to forest owner/managers (Scope). The standard also requires that contractors are aware of the standard and comply with it.

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	<p>PCSN I: "5.1 The owner/manager shall issue a declaration stating:</p> <p>a) that the owner/manager meets the standard for sustainable forest management and other requirements in the Netherlands PEFC Certification System; and</p> <p>b) a commitment to continuously improve the sustainable forest management."</p> <p>6.2.2 "Management records shall be kept. Management records are an annual management report. These shall include a summary of any work done, information about the amount of timber and other forest products felled and sold, and any variations from the plan as a minimum requirement".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires forest owners / managers to issue a declaration (a commitment) to comply with the standard and continuously improve forest management (5.1) and keep management records (6.2.2).</p>
<p>e) specify "100% PEFC certified", or another system specific claim, as claim to be used to communicate the origin of products in an area covered by the standard to customers with a PEFC chain of custody;</p> <p>Note: System specific claims of PEFC endorsed standards and PEFC Council approved abbreviations of such claims and the claim "100% PEFC certified", and their translations into languages other than English, are published online on the PEFC website www.pefc.org.</p>	YES	<p>PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area:</p> <p>a) Customer identification</p> <p>b) The name of the owner/manager as the supplier of the product</p> <p>c) Product identification</p> <p>d) Quantity of products</p> <p>e) Delivery identification based on the date of delivery, delivery period or accounting period</p> <p>f) The "100% PEFC certified" claim</p> <p>g) The certificate number of the owner/manager".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard states that forest owner/manager with PEFC-recognised certificate issued against the Standard shall use PEFC claims "100% PEFC certified".</p>
f) require that where owners/managers of forests are selling products from areas other than covered by the standard, only products from areas covered by the standard are sold with the claim "100% PEFC-certified" or a system specific claim;	YES	<p>PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area:</p> <p>a) Customer identification</p> <p>b) The name of the owner/manager as the supplier of the product</p> <p>c) Product identification</p> <p>d) Quantity of products</p> <p>e) Delivery identification based on the date of delivery, delivery period or accounting period</p> <p>f) The "100% PEFC certified" claim</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>g) The certificate number of the owner/manager".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the usage of the PEFC claim "100% PEFC certified" is only allowed for products sourced from the certified area.</p>
g) require that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a PEFC recognised certificate issued against the standard;	YES	<p>PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area:</p> <p>a) Customer identification</p> <p>b) The name of the owner/manager as the supplier of the product</p> <p>c) Product identification</p> <p>d) Quantity of products</p> <p>e) Delivery identification based on the date of delivery, delivery period or accounting period</p> <p>f) The "100% PEFC certified" claim</p> <p>g) The certificate number of the owner/manager".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires that the PEFC claim shall only be used for products originating in the certified area. By definition of PCSN I, the term certified area refers to an areas that is certified against the PEFC standard in the Netherlands (PCSN I, 3.10).</p>
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	<p>PCSN I, 4.1: "The owner/manager shall only attach the following information to products sourced from the certified area:</p> <p>a) Customer identification</p> <p>b) The name of the owner/manager as the supplier of the product</p> <p>c) Product identification</p> <p>d) Quantity of products</p> <p>e) Delivery identification based on the date of delivery, delivery period or accounting period</p> <p>f) The "100% PEFC certified" claim</p> <p>g) The certificate number of the owner/manager".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard defines information that shall be provided to customers for products originating from the certified area.</p> <p>The information complies with PEFC ST 2002:2020 (PEFC international CoC standard).</p>
i) include an overview of applicable legislation, if requirements of this benchmark are not reflected in the regional,	YES	<p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
national or sub-national standard, because they are already addressed through the legislation.		The PCSN Standard is meeting the PEFC requirements directly through its provisions.
4.2 Understanding the needs and expectations of affected stakeholders		
The standard requires that the organisation shall determine:		
a) the affected stakeholders that are relevant to the sustainable forest management;	YES	<p>PCSN I: 4.2 "The owner/manager shall:</p> <p>a) identify the stakeholders who are relevant to the sustainable management of the area (e.g. local residents and users); and</p> <p>b) identify the relevant requirements and expectations of these stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify relevant stakeholders. The term relevant stakeholders is broader than the PEFC definition of the term "affected stakeholder".</p>
b) the relevant needs and expectations of these stakeholders.	YES	<p>PCSN I: 4.2 "The owner/manager shall:</p> <p>a) identify the stakeholders who are relevant to the sustainable management of the area (e.g. local residents and users); and</p> <p>b) identify the relevant requirements and expectations of these stakeholders".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify relevant needs and expectations of the identified stakeholders.</p>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope.	YES	<p>PCSN I defines the scope of the PEFC certification by chapter Scope (1).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I defines the scope of the PEFC certification by chapter Scope (1). Firstly, the standard applies to forest owners / managers, the standard applies to "certified areas", the scope of the management system is limited to activities that are defined by the requirements of the standard.</p>
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.	YES	<p>PCSN I:</p> <p>6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>Appendix 1 includes a detailed description of the forest management plans and integrates inventory of forest resources, its monitoring and review and continuous improvement.</p> <p>PCSN I: 5.3 (Appendix 2): 6.1.1 "The owner/manager shall assess any risks and opportunities regarding compliance</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>with the requirements of this standard for the sustainable management of trees outside forest areas. The scale and extent of these being implemented in the trees outside forest areas shall be taken into account".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The planning requirement (6.2.1) integrates the requirements of an inventory, planning, monitoring and review with the overall objective of continuous improvement. The risk assessment is integrated in requirement 6.1.1.</p>
5. Leadership		
5.1 The standard requires that the organisation shall provide a commitment:		
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;	YES	<p>PCSN I: 5.3 (Appendix 2): 5.1 "The owner/manager shall issue a declaration stating:</p> <p>a) that the owner/manager meets the standard for trees outside forest management and other requirements in the Netherlands PEFC Certification System; and</p> <p>b) a commitment to continuously improve the sustainable management of trees outside forest areas".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the commitment to comply with the scheme requirements and to continuously improve the ToF management.</p>
b) to continuously improve the sustainable forest management system.	YES	<p>PCSN I: 5.3 (Appendix 2): 5.1 "The owner/manager shall issue a declaration stating:</p> <p>a) that the owner/manager meets the standard for trees outside forest management and other requirements in the Netherlands PEFC Certification System; and</p> <p>b) a commitment to continuously improve the sustainable management of trees outside forest areas".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the commitment to comply with the scheme requirements and to continuously improve the ToF management.</p>
5.2 The standard requires that this commitment shall be publicly available.	YES	<p>PCSN I: 5.2 "This declaration shall be available to the public".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a publicly available commitment.</p>
5.3 The standard requires that responsibilities for sustainable forest	YES	<p>PCSN I: 5.3 (Appendix 2): "Any responsibilities for operating sustainable management of trees outside forest areas shall be clearly defined and assigned."</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
management shall be clearly defined and assigned.		Compliance: Conformity Justification: The Standard requires to identify responsibilities for the ToF management.
6. Planning		
6.1 Actions to address risks and opportunities		
6.1.1 The standard requires that the organisation shall consider risks and opportunities concerning compliance with the requirements for sustainable forest management. Size and scale of the operations of the organisation shall be considered.	YES	PCSN I: 6.1.1 (Appendix 2): "The owner/manager shall assess any risks and opportunities regarding compliance with the requirements of this standard for sustainable management of trees outside forest areas. The scale and extent of these being implemented in the trees outside forest areas shall be taken into account". Compliance: Conformity Justification: The Standard requires to identify risk and opportunities, including consideration of size and scale of operations.
6.1.2 The standard requires that inventory and mapping of forest resources shall be established and maintained, adequate to local and national conditions and in correspondence with the requirements described in this international benchmark standard.	YES	PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1". PCSN I: Appendix 1: "1. Description of the area covered by the plan; Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access". PCSN I: Appendix 1: "5. Attachments to the management plan; A number of (map) attachments form part of the management plan: a) Ownership registration (proof of ownership and/or an extract from land registry records) b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams. e) Measures for working safely". Compliance: Conformity Justification: The Standard requires a management plan to comply with Appendix 1. Appendix 1 integrates inventory and mapping of forest resources and covers the scope of requirements of the whole standard.
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
a) elaborated and periodically updated or continually adjusted;	YES	<p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "Forest management should be documented in a ten-year management plan, which also includes the long-term vision. This guideline indicates the minimum requirements of the management plan, on the basis of which a quality inspection can be carried out by the certification body".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires 10-year management plan.</p>
b) appropriate to the size and use of the forest area;	YES	<p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1 defines detailed content of the plan and ensures that it is appropriate to the size and use of the forest area.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The suitability of the management plan to the size and use for the area is integrated into elements required by Appendix 1.</p> <p>It should be noted that the size of ToF areas in the Netherlands are always small (<0.5 ha) and the standard, as well as Appendix 1 has been developed to address the needs of the small ownership and the use of forest area.</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires compliance with legal requirements (6.3.1.1) and this also apply to ToF planning.</p>
d) adequately covering forest resources.	YES	<p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		Compliance: Conformity Justification: Appendix 1 includes detailed requirements for forest management plans, including description of forest resources that ensures their coverage by the management plan.
6.2.2 The standard requires that management plans shall take into account the different uses or functions of the managed forest area.	YES	<p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p> <p>PCSN I: Appendix 1: "2. Objectives A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation b) the required forest make-up, with attention being paid to the variety of types, blending, age structure, and structure on an ecosystem and type-based level. (Reference to SNL Nature Types (Subsidiestelsel Natuur en Landschap - Nature and Landscape Subsidy System) is sufficient) c) forest products (wood and non-wood) d) standing wood stocks, minimum and maximum felling e) improving biodiversity f) infrastructure."</p> <p>PCSN I: Appendix 1: "5. Attachments to the management plan A number of (map) attachments form part of the management plan: a) Ownership registration (proof of ownership and/or an extract from land registry records) b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams. e) Measures for working safely".</p> Compliance: Conformity Justification: The Standard requires management plan that complies with Appendix 1 (6.1.1). Appendix 1 then includes detailed elements of the management including description of forest resources (1), objectives (2), management activities (3), management planning (4), Attachments and maps (5), and monitoring and review (6). All those elements require to describe the forest resources and their functions (1, 5) that predefine other planned activities (2, 3, 4, 6).
6.2.3 The standard requires that management plans shall include at least a	YES	PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1".

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
description of the current forest management unit, long-term objectives, and the average annual allowable cut, including its justification.		<p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p> <p>PCSN I: Appendix 1: "2. Objectives A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation b) the required forest make-up, with attention being paid to the variety of types, blending, age structure, and structure on an ecosystem and type-based level. (Reference to SNL Nature Types (Subsidiestelsel Natuur en Landschap - Nature and Landscape Subsidy System) is sufficient) c) forest products (wood and non-wood) d) standing wood stocks, minimum and maximum felling e) improving biodiversity f) infrastructure."</p> <p>PCSN I: Appendix 1: "3. Management activities A description of the activities carried out to achieve the objectives. Attention is paid to this: a) felling..."</p> <p>PCSN I, 7.1.2: "The timber felling target included in the management plan shall not exceed the growth rate over the medium and long terms. This shall be supported by justifying the annual allowable cut in the management plan".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires the annual allowable cut and its justification to be included in the management plan (7.1.2)..</p>
6.2.4 The standard requires that the annually allowable use of non-wood forest products shall be included in the management plan where forest management covers commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.	N/A	<p>PCSN I: 6.2.1 "A management plan shall be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "2. Objectives: A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation ... c) forest products (wood and non-wood)..."</p> <p>Compliance: Not applicable</p> <p>Justification:</p> <p>The Standard (Appendix 1) includes detailed requirements for the content of management plan, including forest resources description (1) and objective (2). Harvest of non-timber forest products is only very generally covered by the objectives of the management plan.</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Potential harvesting of non-timber products in the Netherlands such as berries, walnuts, branches or leaves for decoration purposes, is conducted in the Netherlands in a very small scale and does not affect sustainability of the resources. This is confirmed by a study provided by the PEFC Netherlands (https://edepot.wur.nl/412191)^[39].</p> <p>Concerning harvesting of Christmas tree, most of the Christmas tree production is linked to the Christmas tree plantations that are excluded from the PCSN certification (PCSN I, 3.2). Harvesting of Christmas trees in forest standards has a very small proportion (https://edepot.wur.nl/412191)^[39].</p> <p>The game management and its sustainability is governed by legislation and its main objectives is to regulate damages to forest stands.</p>
6.2.5 The standard requires that management plans specify ways and means to minimise the risk of degradation and damage to natural ecosystems.	YES	<p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto: a) characterisation of the forest b) composition by types of tree c) routine and other growth d) vitality (e.g. disease, pests, damage from grazing, adverse weather affects and activity) e) forest structure and blends f) dead wood g) ecologically valuable elements h) areas/zones dedicated to meeting European, national, regional or local nature objectives. i) any sites of historically archaeological, cultural or spiritual importance present, j) the level of public access".</p> <p>PCSN I: Appendix 1: "2. Objectives A description of the management objectives geared towards preserving and improving the economic, ecological and social aspects of the forest. The following subjects shall be included as a minimum requirement: a) objectives relating to wood stocks and production, nature and recreation b) the required forest make-up, with attention being paid to the variety of types, blending, age structure, and structure on an ecosystem and type-based level. (Reference to SNL Nature Types (Subsidiestelsel Natuur en Landschap - Nature and Landscape Subsidy System) is sufficient) c) forest products (wood and non-wood) d) standing wood stocks, minimum and maximum felling e) improving biodiversity f) infrastructure."</p> <p>PCSN I: Appendix 1: "3. Management activities A description of the activities carried out to achieve the objectives. Attention is paid to this: a) felling b) rejuvenation c) control of unwanted types and/or the use of plant protection products and biocides d) measures to improve biodiversity e) ensuring safe working practices - through training courses, for example f) results of any recent relevant scientific research g) risk of damage to third parties, through a Virtual Tree Assessment, for example h) landscape values".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes detailed requirements (elements) for a management plan including forest resources description, objectives and planned activities. The detail of those requirements ensures that forest owner/manager</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		know the risks relating to forests (1) and the management activities (3) address the risks to ensure that the objectives are delivered (2).
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	<p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1".</p> <p>PCSN I: Appendix 1: "3. Management activities A description of the activities carried out to achieve the objectives. Attention is paid to this: ... f) results of any recent relevant scientific research..."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (Appendix 1) requires that attention is paid to results of any recent scientific research (3f).</p>
6.2.7 The standard requires that a summary of the management plan, appropriate to the scope and scale of forest management, shall be publicly available and shall include information on the general objectives and forest management principles.	YES	<p>PCSN I: 6.2.3 "The management plan, or a summary of this, should be made available to the public. Any commercially sensitive information may be omitted".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard require public availability of management plans (6.2.3) with possible omission of commercially sensitive information.</p>
6.2.8 The standard requires that the publicly available summary of the management plan may exclude confidential business and personal information and other information made confidential by applicable legislation or for the protection of cultural sites or sensitive natural resource features.	YES	<p>PCSN I: 6.2.3 "The management plan, or a summary of this, should be made available to the public. Any commercially sensitive information may be omitted".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard allows that any commercially sensitive information may be omitted from publication. (6.2.3).</p>
6.3 Compliance requirements		
6.3.1 Legal compliance		
<p>6.3.1.1 The standard requires that the organisation shall identify and have access to the legislation applicable to its ToF management and determine how these compliance obligations apply to the organisation.</p> <p>Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the "legislation applicable to forest management" is defined by the VPA agreement.</p>	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires identification of the relevant regulations (6.3.1.1).</p>
6.3.1.2 The standard requires that the organisation shall comply with applicable local, national and international legislation on ToF management, including but not	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
limited to agriculture and agroforestry, nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; crop damage compensation, anti-corruption and the payment of applicable royalties and taxes.		<p>species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires identification of the relevant regulations and defines areas of the applicable legislation that is complying with the PEFC requirement (6.3.1.1).</p>
6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-corruption measures appropriate to the risk of corruption.	YES	<p>PCSN I: “6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires compliance with anticorruption legislation (6.3.1.1). The Netherlands has an effective anticorruption legislation that is covered by two major laws</p> <ol style="list-style-type: none"> 1. The Criminal law: https://wetten.overheid.nl/BWBR0001854/2016-07-01 2. Law for Prevention of Money Laundering and Terrorist Financing: https://wetten.overheid.nl/BWBR0024282/2018-07-25 <p>The effectiveness of this legislation can be proven by the latest Corruption Perception Index of 2020, in which the Netherlands scores 82/100, that is ranking the country the number 8 out of 180. https://www.transparency.org/en/countries/netherlands</p>
6.3.1.4 The standard requires that measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.	YES	<p>UA SFM ST 02, 6.3.1.4: “The measures shall be implemented to address protection of the forest from unauthorised activities such as illegal logging, illegal land use, illegally initiated fires, and other illegal activities.”</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires anti-corruption measures to be implemented in compliance with the anti-corruption legislation.</p>
6.3.2 Legal, customary and traditional rights related to the forest land		
6.3.2.1 The standard requires that 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 shall be clarified, recognised and respected.	YES	<p>PCSN I: “6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes.”</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
Note: Guidance for the handling of tenure arrangements can be obtained from the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.		<p>PCSN I: Appendix 1: Content of the forest management plan.</p> <p>6. "a) Ownership registration (proof of ownership and/or an extract from land registry records)"</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for tenure and land-use rights (6.3.1.1) and legal property rights (A1, 6).</p> <p>Customary and traditional rights are not applicable in the Dutch circumstances because all land use rights are regulated through legislation. A.o. via the Civil code 3: https://wetten.overheid.nl/BWBR0005291/2017-09-01/#Boek3_Titeldeel4_Afdeling3_Artikel99 and the cadastre code: https://wetten.overheid.nl/BWBR0004541/2017-09-01/#Hoofdstuk1</p>
6.3.2.2 The standard requires that forest practices and operations shall be conducted in recognition of the established framework of legal, customary and traditional rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved, or is in dispute, there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.	N/A	Not applicable as there are no indigenous people in the Netherlands.
6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights.	YES	<p>PCSN I:</p> <p>6.3.2.2 "The owner/manager shall use a CAO (collective working agreement) relevant to his/her members of staff".</p> <p>6.3.2.3 "The owner/manager shall make a commitment to equal opportunities, zero discrimination and no antisocial behaviour in the workplace. Gender equality will be promoted".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I requires commitment to equal opportunities, zero discrimination and gender balance shall be promoted (6.3.2.3).</p>
6.3.3 Fundamental ILO conventions		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
<p>6.3.3.1 The standard requires that forest practices and operations shall comply with fundamental ILO conventions.</p> <p>Note: In countries where the fundamental ILO conventions have been ratified, the requirements of 6.3.3.1 apply. In countries where a fundamental convention has not been ratified and its content is not covered by applicable legislation, specific requirements shall be included in the forest management standard.</p>	YES	<p>PCSN I: "6.3.1.1 The owner/manager shall identify and comply with national legislation. This includes legislation on forest management practices; nature and environmental protection; protected and endangered species, property, tenure and land-use rights for stakeholders; health, labour and safety-issues, anti-corruption and the payment of applicable royalties and taxes."</p> <p>The Netherlands has ratified all 8 ILO Conventions Supervising the application of International Labour Standards for Netherlands in 2020 (ilo.org).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Netherlands has ratified all eight fundamental ILO conventions and it can be assumed that those have been implemented through the national legislation. The national labour related legislation is referenced in PCSN requirement 6.3.1.1.</p>
6.3.4 Health, safety and working conditions		
<p>6.3.4.1 The standard requires that forest operations shall be planned, organised and performed in a manner that enables health and accident risks to be identified and all reasonable measures to be applied to protect workers from work-related risks. Workers shall be informed about the risks involved with their work and about preventive measures.</p>	YES	<p>PCSN I: Appendix 1: 6.3.2.1 "Safety regulations have been adopted and personal protective equipment is used in accordance with the Gardeners and Landscaping Health and Safety at Work Manual. The owner/manager shall provide instructions and ensure that his/her own employees, volunteers and private timber buyers comply with them".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I requires to adopt safety regulation and shall ensure usage of safety equipment (6.3.2.1) and makes a reference to the "Forests and Nature Health and Safety Manual^[40] ("Arbocatalogus Bos en Natuur", https://www.stigas.nl/agroarbo/bos-en-natuur).</p> <p>The manual includes detailed health and safety measures as well as Checklists for each area, including evaluation of health and safety related risks.</p>
<p>6.3.4.2 The standard requires that working conditions shall be safe, and guidance and training in safe working practices shall be provided to all those assigned to a task in forest operations. Working hours and leave shall comply with national laws or applicable collective agreements.</p> <p>Note: Guidance for specifying national standards can be obtained from the ILO Code of Good Practice: Safety and Health in Forestry Work.</p>	YES	<p>PCSN I: 6.3.2.1 "Safety regulations have been adopted and personal protective equipment is used in accordance with the Forests and Nature Health and Safety at Work Manual. The forest owner shall provide instructions and ensure that his/her own employees, volunteers and private timber buyers comply with them".</p> <p>PCSN I: 6.3.2.2 "The owner/manager shall use a CAO (collective working agreement) relevant to his/her members of staff".</p> <p>PCSN I: Appendix 1: 7.6.4 "Companies deployed for work in the forest shall meet the following conditions: - The contractor shall be aware of the content of this standard and works in accordance therewith. - Contractors shall be Groenkeur certified, or meet demonstrably equivalent requirements (such as ErBo). - Contractors and subcontractors shall work in accordance with the Working</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		<p>Conditions Act, the Gardeners and Landscaping Health and Safety at Work Manual or equivalent.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN I requires to adopt safety regulation and shall ensure usage of safety equipment (6.3.2.1).</p>
<p>6.3.4.3 The standard requires that wages of local and migrant forest workers as well as of contractors and other operators operating in PEFC-certified areas shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements.</p> <p>Note: Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</p>	YES	<p>PCSN I: 6.3.2.2 “The owner/manager shall use a CAO (collective working agreement) relevant to his/her members of staff”.</p> <p>PCSN I: Appendix 1: 7.6.4 “Companies deployed for work in the forest shall meet the following conditions: - The contractor shall be aware of the content of this standard and works in accordance therewith. - Contractors shall be Groenkeur certified, or meet demonstrably equivalent requirements (such as ErBo). - Contractors and subcontractors shall work in accordance with the Working Conditions Act, the Gardeners and Landscaping Health and Safety at Work Manual or equivalent”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The forest owner/manager shall use a collective working agreement (6.3.2.2). Contractors are required to comply with the Working Conditions Act and the General Terms and Conditions for gardening/landscaping subcontractors. (7.6.4).</p> <p>The collective working agreement and the Working Conditions Act and the the General Terms and Conditions for Forestry Subcontractors should ensure that wages will meet at least legal requirements and collective bargaining agreement.</p>
<p>6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and freedom from workplace harassment. Gender equality shall be promoted.</p>	YES	<p>6.3.2.3 “The owner/manager shall make a commitment to equal opportunities, zero discrimination and no antisocial behaviour in the workplace. Gender equality will be promoted”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes a requirement for equal opportunities and non-discrimination and promotion of gender balance.</p>
7. Support		
7.1 Resources		
<p>7.1.1 The standard requires that the organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system.</p>	YES	<p>PCSN I, 5.5: “The owner/manager will make (financial) resources available for planning, implementing and continuously improving any action which shall be taken to comply with this standard”.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
		The Standard requires availability of resources needed for planning, implementing, maintenance and continual improvement of actions required by the standard (5.5).
7.2 Competence		
7.2.1 The standard requires that land managers, contractors, employees and land owners shall be provided with sufficient information and kept up-to-date through continuous training in relation to agroforestry, good agriculture practices, and forestry practices, as a precondition for all management planning and practices described in this benchmark.	YES	<p>PCSN I: 6.3.3.1 "All employees of the owner/manager working in forest management shall be made aware of the content of this standard and will work in accordance with it. They should be sufficiently qualified and have undergone training in the field of working in forest management. Any training sessions shall be documented".</p> <p>PCSN I: Appendix 1: 7.6.4 "Companies deployed for work in the forest shall meet the following conditions: - The contractor shall be aware of the content of this standard and works in accordance therewith. - Contractors shall be Groenkeur certified, or meet demonstrably equivalent requirements (such as ErBo). - Contractors and subcontractors shall work in accordance with the Working Conditions Act, the Gardeners and Landscaping Health and Safety at Work Manual or equivalent".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires all employees of the owner/manager to be aware of the standard, to be qualified and undergo training (6.3.3.1).</p> <p>Contractors shall be certified or otherwise demonstrate their competencies, shall be aware of the standard and comply with general terms and conditions for forestry subcontractors (7.6.4).</p>
7.3 Communication		
7.3.1 The standard requires that effective communication and consultation with local communities, indigenous peoples and other stakeholders relating to sustainable forest management shall be provided.	NO	<p>PCSN I: 5.4 The owner/manager communicates with the stakeholders, and explains the objectives and management plan".</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Standard requires the owner / manager to communicate with stakeholders. However, the requirement does not include the elements of "effective communication" and "consultation".</p>
7.4 Complaints		
7.4.1 The standard requires that appropriate mechanisms are in place for resolving complaints and disputes relating to forest management operations, land use rights and work conditions.	YES	<p>PCSN I, Appendix 1: 4.3 "The owner/manager shall have adequate procedures in place for handling complaints and disputes relating to working with trees outside forests and working conditions".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes provisions for handling complaints and disputes (4.3).</p>
7.5 Documented Information		

PEFC benchmark requirement	YES / NO*	Reference to system documentation (including quotation of relevant text)
7.5.1 The standard requires that the organisation's management system shall include documented information required by the standard and determined by the organisation as being necessary for the effectiveness of the sustainable forest management system.	YES	<p>PCSN I: 5.1 "The owner/manager shall issue a declaration stating:</p> <p>a) a commitment to continuously improve the sustainable forest management".</p> <p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1"</p> <p>PCSN II 6.2.2 "Management records shall be kept. Management records are an annual management report. These shall include a summary of any work done, information about the amount of timber and other forest products felled and sold, and any variations from the plan as a minimum requirement".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a owner/manager declaration (5.1), management plan (6.2.1) and management records (6.2.2). This constitutes fundamental documented information for effectiveness of the ToF management.</p>
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	YES	<p>PCSN I: 6.2.1 "A management plan should be drawn up in accordance with Appendix 1"</p> <p>PCSN II 6.2.2 "Management records shall be kept. Management records are an annual management report. These shall include a summary of any work done, information about the amount of timber and other forest products felled and sold, and any variations from the plan as a minimum requirement".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (appendix 1) requires the content of the management plan and regular 10-years update. The management records shall be kept and be relevant to the forest management activities (6.2.2).</p>

8. Operation		
8.1 Criterion 1: Maintenance or appropriate enhancement of forest resources and their contribution to the global carbon cycle		
<p>8.1.1 The standard requires that management shall aim to maintain or increase the cover, value, and/or diversity of trees in the landscape and their related ecosystem services and maintain or enhance the economic, ecological, cultural and social values and are aligned with existing land-use regimes.</p> <p>Note: When the requirement is not achievable within individual, ToF-extensive areas, it can be considered at landscape level.</p>	YES	<p>PCSN I: Appendix 2, 7.1.1 “The TOF manager shall preserve the number and the diversity of trees. This shall also be included in the management plan. Products from tree transformation within the certified area, which are not compensated elsewhere, may not be claimed to be PEFC certified”.</p> <p>Compliance: conformity</p> <p>Justification:</p> <p>The Standard does require to maintain the cover and value by a number of trees and diversity of trees (7.1.1). Individual requirements of the standard ensure that the ecosystems services, economic, ecological, cultural and social values of land resources are maintained or enhanced.</p>
<p>8.1.2 The standard requires that management shall maintain or enhance ToF resources and their capacity to capture and store carbon in the medium and long term by balancing harvesting and growth rates, and by minimising direct or indirect damage to ecosystem services.</p>	YES	<p>PCSN I: 7.1.3 Management activities should encourage an action which has positive impacts on the climate, such as reducing greenhouse gas emissions or the efficient use of other raw materials.</p> <p>PCSN I: 7.3.4 The harvesting rate of (non-) wood products shall remain sustainable over the long term.</p> <p>PCSN I: “7.3.2 No branches or top wood will be removed, namely any tree parts above ground with a diameter of less than 8 centimetres at the thicker end. The removal of branches and top wood is permitted within landscape planting, urban areas and on mineral-rich soils (albeit not on podzol soils or limestone-poor sandy soils) or for ecological and/or cultural-historical reasons which have been justified in the management plan”.</p> <p>“7.3.3 Leaf foliage and below-ground biomass shall not be removed”.</p> <p>7.4.3 “Forest rejuvenation shall make use of tree species appropriate to the area where they will grow...”.</p> <p>7.4.4 “Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible should the current share of native deciduous trees is more than 20%”.</p> <p>PCSN I: Appendix 2, Rural ToF: “7.4.6 At least 50% of the certified property in an agricultural or landscape area shall consist of mixed forest or planting. This shall be included as an objective in the management plan with a transition period of 40 years should this proportion have not yet been reached. This shall be preserved wherever possible if the current mix exceeds 50%. An exception to the mix ratio can be made for avenues and rows of trees”.</p> <p>PCSN I: Appendix 2, Urban ToF: “7.4.6 The TOF manager shall aim for a 10-20-30 split within the certified property in urban areas. A maximum of 10% of the total tree stock may be of the same types, a maximum of 20% of the total tree stock of the same genus and a maximum of 30% of the total tree stock from the same family. This shall be</p>

		<p>included as an objective in the management plan giving a transition period of 40 years should this proportion have not yet been reached. The existing diversity in the tree stock shall be preserved".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for maintaining the quality and quantity of land and ToF resources by defining a sustainable harvest and requirements for regeneration and silviculture treatment promoting mixed forests or plantings.</p>
8.1.3 The standard requires that climate positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged.	YES	<p>PCSN I: "PCSN I: 7.1.3 Management activities should encourage an action which has positive impacts on the climate, such as reducing greenhouse gas emissions or the efficient use of other raw materials".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for climate positive practices, including efficient use of resources and reduction of greenhouse gas emissions (7.1.3).</p>
8.1.4 The standard requires that forest conversion to ToF shall not occur unless in justified circumstances where the conversion.		
TOF areas established by a forest conversion after 31 December 2010 in other than "justified circumstances" do not meet the requirement and are not eligible for certification.	YES	<p>PCSN I: Appendix 2, "7.1.1a) The TOF manager shall preserve the number and the diversity of trees. This shall also be included in the management plan.</p> <p>TOF areas established by a conversion after 31 December 2010, unless the conversions meets the provisions of 7.1.1 a-f from requirement for forests certification, do not meet the requirement and are not eligible for certification."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard includes a provision that prohibits TOF established after 31.12.2010 to become eligible for PEFC certification.</p>
<p>8.1.5 The standard requires that conversion of ecologically important non-forest ecosystems to TOF areas shall not occur unless in justified circumstances.</p> <p>TOF areas established by a conversion after 31 December 2010 in other than "justified circumstances" do not meet the requirement and are not eligible for certification.</p>		
TOF areas established by a conversion after 31 December 2010 in other than "justified circumstances" do not meet the requirement and are not eligible for certification.	YES	<p>PCSN I, Appendix 2: "7.1.4 a) Conversion of ecologically significant non-forest areas to TOF areas shall not lead to ecological decline</p> <p>b) TOF areas established by a conversion after 31 December 2010, unless the conversions meets the provisions of 7.1.1 a-f from requirement for forests certification, do not meet the requirement and are not eligible for certification."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits afforestation of ecologically important non-forest areas, unless it meets the justified circumstances (7.1.4).</p>

		The standard specifies that when such afforestation would result in ToF after 31.12.2010, this is not eligible for PEFC certification (See PEFC ST 1003:2018).
8.2 Criterion 2: Maintenance of forest ecosystem health and vitality		
8.2.1 The standard requires that health and vitality of ToF areas shall be maintained or enhanced and degraded lands shall be rehabilitated wherever and as far as economically feasible, by making best use of landscape features, natural processes and processes and using preventive biological measures.	YES	<p>PCSN I: Appendix 2, "7.2.3 Damage to permanent trees, shrubs and soil should be avoided as much as possible while working. For construction or groundwork within the canopy projection of a tree in an urban environment, a Tree Survey should be completed".</p> <p>PCSN I: "7.4.2 Support shall be given to initiatives aimed at restoring, conserving or improving special (forest) ecosystems or populations of endangered animal and plant species, subject to financial constraints".</p> <p>PCSN I: 7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible should the current share of native deciduous trees is more than 20%".</p> <p>PCSN I: Appendix 2, Rural ToF: "7.4.6 At least 50% of the certified property in an agricultural or landscape area shall consist of mixed forest or planting. This shall be included as an objective in the management plan with a transition period of 40 years should this proportion have not yet been reached. This shall be preserved wherever possible if the current mix exceeds 50%. An exception to the mix ratio can be made for avenues and rows of trees".</p> <p>PCSN I: Appendix 2, Urban ToF: "7.4.6 The TOF manager shall aim for a 10-20-30 split within the certified property in urban areas. A maximum of 10% of the total tree stock may be of the same types, a maximum of 20% of the total tree stock of the same genus and a maximum of 30% of the total tree stock from the same family. This shall be included as an objective in the management plan giving a transition period of 40 years should this proportion have not yet been reached. The existing diversity in the tree stock shall be preserved".</p> <p>PCSN I: "7.4.11 There should be on average 6 m3 of large, dead trees per hectare. These will be native trees wherever possible. This will be included as an objective in the management plan, citing a transition period should this quantity have not yet been reached. This criterion shall not apply where: a) it poses safety issues for forest visitors and/or traffic; b) it is not appropriate for the development phase of the forest or there are not enough large trees in the forest area in question for other reasons."</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements relating to the forest health and vitality; avoiding damage to the standing trees and shrubs (7.2.3), promoting native species (7.4.4), mixed tree cover (7.4.6) and dead wood (7.4.11) and restoration of forest ecosystems (7.4.2).</p>
8.2.2 The standard requires that adequate genetic, species and structural diversity shall be encouraged or maintained to	YES	PCSN I, Appendix 2: "7.5.2 When planting new trees the owner/manager shall make use of tree species

enhance the stability, vitality and resilience of the TOF area.		<p>appropriate to the area where they will grow. Genetically modified organisms or plant material shall not be used".</p> <p>PCSN I: 7.4.2 "Support shall be given to initiatives aimed at restoring, conserving or improving special (forest) ecosystems or populations of endangered animal and plant species, subject to financial constraints".</p> <p>7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible should the current share of native deciduous trees is more than 20%".</p> <p>PCSN I: Appendix 2, Rural ToF: "7.4.6 At least 50% of the certified property in an agricultural or landscape area shall consist of mixed forest or planting. This shall be included as an objective in the management plan with a transition period of 40 years should this proportion have not yet been reached. This shall be preserved wherever possible if the current mix exceeds 50%. An exception to the mix ratio can be made for avenues and rows of trees".</p> <p>PCSN I: Appendix 2, Urban ToF: "7.4.6 The TOF manager shall aim for a 10-20-30 split within the certified property in urban areas. A maximum of 10% of the total tree stock may be of the same types, a maximum of 20% of the total tree stock of the same genus and a maximum of 30% of the total tree stock from the same family. This shall be included as an objective in the management plan giving a transition period of 40 years should this proportion have not yet been reached. The existing diversity in the tree stock shall be preserved".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires genetic (7.5.3), species (7.4.2, 7.5.2, 7.4.4) and structural diversity (7.4.2, 7.4.6).</p> <p>Observation:</p> <p>PCSN I, Appendix 2 includes a mistake in numbering of chapters. The chapter 7.5.2 in Appendix 2 should properly refer to chapter 7.4.3 in the core part of the PCSN I document.</p>
8.2.3 The standard requires that use of fire shall be limited to regions where fire is an essential tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous peoples. In these cases adequate management and control measures shall be taken.	YES	<p>PCSN I: "7.2.5 The use of fire as a control method shall be restricted to areas where this method is essential for preserving certain types or habitats. Clear management objectives under such circumstances shall be outlined and adequate safety measures shall be put in place.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements restricting the use of fires in the management (7.2.5).</p>
8.2.4 The standard requires that appropriate TOF management practices shall use tree, crop and animal species and provenances that are suited to the site conditions or the use of tending, harvesting and transport techniques that minimise tree and/or soil damages shall be applied.	YES	<p>PCSN I, Appendix 2: "7.5.2 When planting new trees the owner/manager shall make use of tree species appropriate to the area where they will grow. Genetically modified organisms or plant material shall not be used".</p> <p>7.4.4 "Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an</p>

		<p>objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible should the current share of native deciduous trees is more than 20%”.</p> <p>PCSN I: Appendix 2, “7.2.3 Damage to permanent trees, shrubs and soil should be avoided as much as possible while working. For construction or groundwork within the canopy projection of a tree in an urban environment, a Tree Survey should be completed”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for usage of site suited species in reforestation and afforestation (7.5.2) and minimisation of damages to trees and to the forest cover (7.2.3).</p>
8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.	NO	<p>PCSN I: “7.2.4 Only biodegradable fuels, oils and lubricants shall be used, provided this is possible from a technical perspective. Any non-biodegradable fuels will be collected, stored in designated locations and disposed of in an environmentally friendly manner. Any leakage of oil or fuel during management work shall be avoided as much as possible. Emergency procedures will be in place for minimising the risk of any damage to the environment caused by accidental spillage.”</p> <p>PCSN I: 7.5.6 “Disposing of waste in the forest shall be avoided as much as possible.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Standard includes requirements for disposal of waste, (7.5.6), and for avoidance of spillage of oil or fuel (7.2.4). The minor non-conformity relates to the fact that 7.5.6 does not ensure that disposal of waste is strictly avoided.</p>
8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	YES	<p>PCSN I: “7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:</p> <p>a) Herbs and grass are not controlled using these substances.</p> <p>b) No insecticides are used unless required on the grounds of public health.</p> <p>c) Any unwanted woody vegetation may be controlled using these substances in accordance with the instructions for use.</p> <p>d) Only crop protection substances or biocides as permitted by the Ctgb (www.ctgb-wageningen.nl) may be used. The use of pesticides classified in World Health Organisation Classes 1A and 1B is not permitted unless no viable alternative is available.</p> <p>e) If pesticides are used, this should be recorded.</p> <p>f) Pesticides based on chlorinated hydrocarbons are not permitted, as they are non-biodegradable and therefore end up in the food chain...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

		The Standard includes requirements for minimisation of the pesticides usage (7.2.1.).
8.2.7 The standard requires that any use of pesticides is documented.	YES	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:...</p> <p>e) If pesticides are used, this should be recorded.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for records on the pesticides usage (7.2.1e).</p>
8.2.8 The standard requires that the WHO Class 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available. Any exception to the usage of WHO Class 1A and 1B pesticides shall be defined in the national/regional standard.	NO	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:</p> <p>d) Only crop protection substances or biocides as permitted by the Ctgb (www.ctgb-wageningen.nl) may be used. The use of pesticides classified in World Health Organisation Classes 1A and 1B is not permitted unless no viable alternative is available.</p> <p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>The Standard includes prohibition of the use of pesticides WHO 1A and 1B class with an exemption clause (7.2.1.).</p> <p>However, the minor non-conformity was assigned as the PEFC requirements states that the derogated substances shall be defined by the national standard.</p> <p>PEFC Netherlands argues that a list of "derogated substances" has been added to PCSN IX. However, the amended version of PCSN IX has not been submitted.</p>
<p>8.2.9 The standard requires that pesticides, such as chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use, and any pesticides banned by international agreement, shall be prohibited.</p> <p>Note: "Pesticides banned by international agreements" are defined in the Stockholm Convention on Persistent Organic Pollutants.</p>	YES	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:</p> <p>d) Only crop protection substances or biocides as permitted by the Ctgb (www.ctgb-wageningen.nl) may be used. The use of pesticides classified in World Health Organisation Classes 1A and 1B is not permitted unless no viable alternative is available</p> <p>f) Pesticides based on chlorinated hydrocarbons are not permitted, as they are non-biodegradable and therefore end up in the food chain.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard prohibits the use of chlorinated hydrocarbons. However, the standard does not prohibit pesticides banned by an international agreement.</p> <p>However, the reference to the Ctgb permission (a formal Dutch authority) ensures that no substances banned by the international agreements are included. See https://toelatingen.ctgb.nl/nl/authorisations.</p>
8.2.10 The standard requires that the use of pesticides shall follow the instructions given by the pesticide producer and be	YES	<p>PCSN I: "7.2.1 Plant protection products and biocides may only be used on a limited basis under the following conditions:...</p>

implemented with proper equipment by trained personnel.		<p>g) These activities shall be carried out in accordance with the Gardenders and Landscaping Health and Safety at Work Manual, and the Working Conditions Act".</p> <p>Compliance: Conformity</p> <p>Justification:</p>
8.2.11 The standard requires that where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment. Fertilizer use shall not be an alternative to appropriate soil nutrient management.	YES	<p>PCSN I: 7.2.2 "Soil will only be fertilized following advice from an expert from an independent research institute. This is given on the basis of any symptoms of declining fertility, where it can be shown that the vitality of types found in the planted area has declined due to external influences, and that it is necessary to improve the vitality of the managed area by applying fertilizer. Fertilizers shall not be used as an alternative to appropriate soil nutrient management".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires controlled use of fertilisers and prohibits the fertilisers to be used as an alternative to soil nutrient management (7.2.2).</p>
8.3 Criterion 3: Maintenance and encouragement of productive functions of forests (wood and non-wood)		
8.3.1 The standard requires that the capability of the TOF to provide wood products, non-wood forest products and/or services from trees on a sustainable basis shall be maintained.	YES	<p>PCSN I: 7.3.1 "The objective is both to safeguard and promote the production and marketing of a wide variety of both timber and non-timber products and services in accordance with the objectives set out in the management plan".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements to maintain production capability of ToF (7.3.1).</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	YES	<p>PCSN I, 7.6.7: "The owner/manager strives towards a healthy economic situation, being open to new market possibilities as well as other economic activities".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for sound economic performance, consideration of new markets and economic activities (7.6.7).</p>
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	YES	<p>PCSN I: 7.5.1 "Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion".</p> <p>PCSN I: 7.5.2 "Natural watercourses, fens, brooks, streams and their banks located in the forest shall be preserved or restored in terms of both quality and quantity. Eutrophication of these waters should be avoided".</p> <p>PCSN I: "7.2.3 Damage to permanent trees, shrubs and soil should be avoided as much as possible while working. For construction or groundwork within the canopy projection of a tree in an urban environment, a Tree Survey should be completed".</p> <p>PCSN I, Appendix 2: "7.5.2 When planting new trees the owner/manager shall make use of tree species</p>

		<p>appropriate to the area where they will grow. Genetically modified organisms or plant material shall not be used.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements that forest operation shall not reduce the productive capacity (7.5.2) and shall not damage soil (7.5.1), water (7.5.2) and remaining vegetation (7.2.3).</p>
8.3.4 The standard requires that harvesting levels of both wood and non-wood forest products shall not exceed a rate that can be sustained in the long term, and optimum use shall be made of the harvested products.	YES	<p>PCSN I: 7.3.4 “The harvesting rate of (non-) wood products shall remain sustainable over the long term”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires a long-term sustainability of wood and non-wood products harvesting (7.3.4).</p>
8.3.5 The standard requires that adequate infrastructure such as roads, skid tracks or bridges shall be planned, established and maintained to ensure efficient delivery of goods and services while minimising negative impacts on the environment.	YES	<p>PCSN I: 7.3.5 There should be an adequate network of work roads, skid roads and access routes. a) Laying tracks and soil compression should be avoided as far as possible by, for example:</p> <ul style="list-style-type: none"> - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling should adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage. <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil.</p> <p>c) The infrastructure should be designed in such a way so that as little damage as possible is caused to ecologically important forest areas, and that consideration is given to (migration patterns of) protected types and cultural and historical elements (see Careful Forest Management Checklist, from the Code of Conduct for Forest Management).”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for building infrastructure with minimisation of impacts on the environment and proper transportation/skidding operations (7.3.5)</p>
8.4 Criterion 4: Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems		
8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity	YES	<p>PCSN I: 7.4.2 “Support shall be given to initiatives aimed at restoring, conserving or improving special (forest)</p>

<p>on landscape, ecosystem, species and genetic levels.</p> <p>When the requirement is not achievable within individual, TOF-extensive areas, it can be considered at landscape level or through group certification.</p>		<p>ecosystems or populations of endangered animal and plant species, subject to financial constraints”.</p> <p>PCSN I, Appendix 2: “7.5.2 When planting new trees the owner/manager shall make use of tree species appropriate to the area where they will grow. Genetically modified organisms or plant material shall not be used.”</p> <p>PCSN I: 7.4.4 “Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible should the current share of native deciduous trees is more than 20%”.</p> <p>PCSN I: Appendix 2, Rural ToF: “7.4.6 At least 50% of the certified property in an agricultural or landscape area shall consist of mixed forest or planting. This shall be included as an objective in the management plan with a transition period of 40 years should this proportion have not yet been reached. This shall be preserved wherever possible if the current mix exceeds 50%. An exception to the mix ratio can be made for avenues and rows of trees”.</p> <p>PCSN I: Appendix 2, Urban ToF: “7.4.6 The TOF manager shall aim for a 10-20-30 split within the certified property in urban areas. A maximum of 10% of the total tree stock may be of the same types, a maximum of 20% of the total tree stock of the same genus and a maximum of 30% of the total tree stock from the same family. This shall be included as an objective in the management plan giving a transition period of 40 years should this proportion have not yet been reached. The existing diversity in the tree stock shall be preserved”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for conservation, maintenance and enhancement of biodiversity at different levels (7.4.2, 7.4.3, 7.4.4 and 7.4.6).</p>
<p>8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas.</p> <p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p>	YES	<p>PCSN I: “7.4.1 The owner/manager shall identify, protect, manage or cordon off ecologically important forest areas”.</p> <p>PCSN I: “3.6 Ecologically important forest areas: Forest areas which have been granted special status through legislation and regulation (Natura2000), and forestry reserves and A-locations”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to identify and protect ecologically important forest areas. The definition of this term refers to areas that are defined by regulations (natura 2000), forestry reserves and A-locations (7.4.1).</p>
<p>8.4.3 The standard requires that protected, threatened and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p>	YES	<p>PCSN I: 7.4.2 “Support shall be given to initiatives aimed at restoring, conserving or improving special (forest) ecosystems or populations of endangered animal and plant species, subject to financial constraints”.</p> <p>PCSN I: 7.4.7 The Forest Management Code of Conduct and/or the Flora and Fauna Management and Maintenance Code of Conduct shall be followed at all times.</p>

Note: The requirement does not preclude trade according to CITES requirements.		Compliance: Conformity Justification: The Standard requires to protect endangered and threatened species and their habitats. This practically excludes any commercial use of the endangered and protected species (7.4.2, 7.4.7).
8.4.4 The standard requires that successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources.	YES	PCSN I, Appendix 2: "7.5.2 When planting new trees the owner/manager shall make use of tree species appropriate to the area where they will grow. Genetically modified organisms or plant material shall not be used." Compliance: Conformity Justification: The Standard includes requirements for successful regeneration, being either natural regeneration or planting (7.5.2).
8.4.5 The standard requires that for reforestation and afforestation origins of native species that are well-adapted to site conditions shall be preferred. Only those introduced species, provenances or varieties shall be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been scientifically evaluated, and if negative impacts can be avoided or minimised. Note: CBD (Convention on Biological Diversity) Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as guidance for avoidance of invasive species.	NO	PCSN I, Appendix 2: "7.5.2 When planting new trees the owner/manager shall make use of tree species appropriate to the area where they will grow. Genetically modified organisms or plant material shall not be used." Compliance: Minor non-conformity Justification: The standard requires to use species that are "appropriate to the area where they grow". However, the wording is not sufficiently detailed to satisfy the PEFC requirement relating to the introduced species.
8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.	YES	PCSN I: 7.4.5 Afforestation, reforestation and other forest planting activities which contribute towards improving and restoring ecological corridors shall be encouraged." Compliance: Conformity Justification: The Standard requires to planting activities shall restore the ecological connectivity (7.4.5).
8.4.7 The standard requires that genetically-modified trees shall not be used. Note: The restriction on the usage of genetically-modified trees has been adopted by the PEFC General Assembly based on the Precautionary Principle. Until enough scientific data on genetically modified trees indicates that impacts on human and animal health and the environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used.	YES	PCSN I, Appendix 2: "7.5.2 When planting new trees the owner/manager shall make use of tree species appropriate to the area where they will grow. Genetically modified organisms or plant material shall not be used". Compliance: Conformity Justification: The Standard requires prohibition of the GMO material in planting.

<p>8.4.8 The standard requires that a diversity of both horizontal and vertical structures and the diversity of species such as mixed stands shall be promoted, where appropriate. The practices shall also aim to maintain or restore landscape diversity.</p>	<p>YES</p>	<p>PCSN I: 7.4.4 “Native deciduous trees and shrubs within the certified area shall occupy at least 20% based on canopy cover or the base area. This shall be included as an objective in the management plan, citing a transition period of 20 years where this proportion has yet to be attained. This shall be maintained where possible should the current share of native deciduous trees is more than 20%”.</p> <p>PCSN I: Appendix 2, Rural ToF: “7.4.6 At least 50% of the certified property in an agricultural or landscape area shall consist of mixed forest or planting. This shall be included as an objective in the management plan with a transition period of 40 years should this proportion have not yet been reached. This shall be preserved wherever possible if the current mix exceeds 50%. An exception to the mix ratio can be made for avenues and rows of trees”.</p> <p>PCSN I: Appendix 2, Urban ToF: “7.4.6 The TOF manager shall aim for a 10-20-30 split within the certified property in urban areas. A maximum of 10% of the total tree stock may be of the same types, a maximum of 20% of the total tree stock of the same genus and a maximum of 30% of the total tree stock from the same family. This shall be included as an objective in the management plan giving a transition period of 40 years should this proportion have not yet been reached. The existing diversity in the tree stock shall be preserved”.</p> <p>PCSN I, Appendix 1: “7.4.13 Trees within the certified area shall preferably not all be felled at the same time. This shall be included in the management plan.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting horizontal and vertical diversity of forest stands by 20 % threshold of native deciduous species (7.4.4), 50 % threshold of mixed forests (7.4.6). and 2ha maximum of harvest on the ToF area.</p>
<p>8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.</p>	<p>YES</p>	<p>PCSN I: “7.4.1 The owner/manager shall identify, protect, manage or cordon off ecologically important forest areas”.</p> <p>PCSN I: “7.4.8 Any work shall be carried out in a manner as instructed for that location in ecologically important forest areas”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for protection of valuable ecosystems regardless of whether they were created by traditional management systems or natural succession (7.4.1, 7.4.8).</p>
<p>8.4.10 The standard requires that tending and harvesting operations shall be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures shall be taken to maintain or improve biological diversity.</p>	<p>YES</p>	<p>PCSN I: “7.4.7 The Forest Management Code of Conduct and/or the Flora and Fauna Management and Maintenance Code of Conduct shall be followed at all times”.</p> <p>PCSN I: “7.2.3 Damage to permanent trees, shrubs and soil should be avoided as much as possible while working”.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

		The Standard includes requirements for compliance with the Code of Conducts that cover the area of reducing negative impacts of harvesting operations (7.4.7) and requires avoidance of damages to the remaining vegetation. (7.2.3).
8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.	YES	<p>PCSN I: 7.3.5 There should be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression should be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling should adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p> <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil.</p> <p>c) The infrastructure should be designed in such a way so that as little damage as possible is caused to ecologically important forest areas, and that consideration is given to (migration patterns of) protected types and cultural historical elements (see Careful Forest Management Checklist, from the Code of Conduct for Forest Management).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements building and maintaining forest infrastructure, and minimisation of its negative impacts on biodiversity (7.3.5).</p>
8.4.12 The standard requires that, with due regard to management objectives, measures shall be taken to balance the effect of domesticated and wild animals on the regeneration and growth of trees, as well as on biodiversity and the control of fire.	YES	<p>PCSN I: 7.4.9 “7.4.9 Livestock may graze within the certified area, provided the growth of the trees already present and therefore the long-term survival is not at stake.”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for control of damages caused by domesticated animals (7.4.9).</p> <p>The standard does not regulate the control of wildlife population. Concerning the urban ToF, the control of wildlife population is not allowed in residential areas. Concerning the agriculture ToF, the potential damages to ToF are negligible, taken into account the small-scale nature of the ToF (<0.50 ha) where regenerated trees are protected individually. The issue has been consulted with expert in both ToF management as well as nature conservation during the in-country visit that confirmed the justification for the requirement on control of the wild population not being applicable.</p> <p>In addition, there are restrictions on hunting wild animals and the regulation only allows their hunting based on</p>

		damages and evaluations made by regional hunting association.
8.4.13 The standard requires that standing and fallen dead wood, hollow trees, old groves and rare tree species shall be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on the health and stability of forests and on surrounding ecosystems.	YES	<p>PCSN I: 7.4.11 "There should be on average 6 m3 of large, dead trees per hectare. These will be native trees wherever possible. This will be included as an objective in the management plan, citing a transition period should this quantity have not yet been reached. This criterion shall not apply where:</p> <p>a) it poses safety issues for forest visitors and/or traffic;</p> <p>b) it is not appropriate for the development phase of the forest or there are not enough large trees in the forest area in question for other reasons".</p> <p>7.4.12 "Existing hollow trees and trees where birds are nesting shall be preserved, unless this is not possible for safety reasons".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for dead wood with specific threshold of 6 m3 per ha (7.4.11), hollow trees and birds' nesting trees (7.4.12).</p>
8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)		
8.5.1 The standard requires that protective functions of trees within the agriculture and settlement landscape shall be maintained and enhanced.	YES	<p>PCSN I: 7.1.3 "Management activities should encourage an action which has positive impacts on the climate, such as reducing greenhouse gas emissions or the efficient use of other raw materials".</p> <p>PCSN I: 7.5.1 "Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion".</p> <p>7.5.2 "Natural watercourses, fens, brooks, streams and their banks located in the forest shall be preserved or restored in terms of both quality and quantity. Eutrophication of these waters should be avoided".</p> <p>PCSN I: 7.5.3 "The groundwater system shall be protected or restored to the extent where this is possible within the forest owner's capabilities".</p> <p>PCSN I: 7.5.5 "Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for protection of sites with protective functions for society, including identification of such forests, planning and implementing appropriate measure and management in unfavourable forest sites (7.5.1-7.5.3-7.5.5).</p>
8.5.2 The standard requires that areas that fulfil specific and recognised protective functions for society shall be mapped, and	YES	<p>PCSN I: Appendix 1: "A number of (map) attachments form part of the management plan: ... b) map(s) showing special elements such as locations that are important due</p>

<p>forest management plans and operations shall ensure the maintenance or enhancement of these functions.</p>		<p>to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams... “</p> <p>PCSN I: 7.5.1 “Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion”.</p> <p>PCSN I: 7.5.5 “Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained”.</p> <p>PCSN I 7.3.5 “There should be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression should be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling should adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p> <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for identification and mapping of areas with protective functions in management plans (Appendix 1), including measures to maintain or enhance those functions (7.5.1, 7.3.5, 7.5.5).</p>
<p>8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.</p>	<p>YES</p>	<p>PCSN I: 7.5.1 “Felling/rejuvenation methods shall take this into account in circumstances where there is a risk of erosion”.</p> <p>PCSN I: 7.5.5 “Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained”.</p> <p>PCSN I 7.3.5 “There should be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression should be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling should adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with</p>

		<p>them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p> <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil".</p> <p>PCSN I: 7.4.9 "There shall be no livestock grazing in the forest. Extensive natural grazing, supported by a well-documented development process may be an option provided that any rejuvenation of the forest and therefore the long-term survival is not under threat".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for protection of soil against erosion in forest management as well as infrastructure building and maintenance (7.5.1, 7.5.3, 7.3.5) and minimising of pressure of animal population (7.4.9).</p>
8.5.4 The standard requires that special care shall be given to forestry operations in forest areas with water protection functions to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way shall be avoided. Downstream water balance and water quality shall not be significantly affected by the operations.	YES	<p>PCSN I: Appendix 1: "A number of (map) attachments form part of the management plan: ... b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance c) map(s) showing boundaries of areas which fall under (inter)national and regional nature objectives d) map(s) showing the infrastructure as well as water courses, pools and streams... "</p> <p>PCSN I: 7.5.2 "Natural watercourses, fens, brooks, streams and their banks located in the forest shall be preserved or restored in terms of both quality and quantity. Eutrophication of these waters should be avoided".</p> <p>PCSN I: 7.5.3 "The groundwater system shall be protected or restored to the extent where this is possible within the forest owner's capabilities".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for water protection, their mapping (Appendix 1) and protection (7.5.2).</p>
8.5.5 The standard requires that construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.	YES	<p>PCSN I: 7.5.5 "Any soil shall be disturbed as little as possible when constructing roads, bridges and other infrastructure where the owner/manager can have an influence over this, while the soil shall be prevented from entering the watercourses and any natural functions and levels of the watercourses and river beds shall be preserved. Proper road drainage shall be both installed and maintained".</p> <p>PCSN I 7.3.5 "There should be an adequate network of work roads, skid roads and access routes.</p> <p>a) Laying tracks and soil compression should be avoided as far as possible by, for example: - maximum planning as much as possible, so that the amount of movement on pathways is restricted. - halting timber felling should adverse weather conditions increase the risk of ruts forming. - stabilising work and skid roads by covering with</p>

		<p>them branches and top wood. - adjusting tyre pressures to the existing surface conditions. - making use of any technical options on equipment, which reduces the pressure on the ground, and track rutting to a minimum, for example by using tracks. - constructing and maintaining road drainage.</p> <p>b) The distance between skid roads shall be a minimum of 20 metres. It is possible to switch from a network system of working and exit routes if required for technical or ecological reasons, or in the interests of protecting soil</p> <p>c) The infrastructure should be designed in such a way so that as little damage as possible is caused to ecologically important forest areas, and that consideration is given to (migration patterns of) protected types and cultural historical elements (see Careful Forest Management Checklist, from the Code of Conduct for Forest Management).</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements for forest infrastructure and its impacts on soil and water (7.5.5, 7.3.5).</p>
8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions		
8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests.	YES	<p>PCSN I: Appendix 1. Description of the area covered by the plan Description of the current forest, with as a minimum reference made thereto:</p> <p>i) any sites of historically archaeological, cultural or spiritual importance present</p> <p>j) the level of public access</p> <p>5. Attachments to the management plan</p> <p>b) map(s) showing special elements such as locations that are important due to ecological, archaeological, historical, cultural, or spiritual significance".</p> <p>PCSN I: 7.6.1 "The forest shall be open and at least be accessible for recreational purposes on foot via the existing paths and roads. Restrictions to access areas shall be permitted in order to protect privacy and personal surroundings, to protect special plants, animals or habitats and other special elements such as archaeological monuments, for the safety of visitors and workers, and for wildlife refuge areas".</p> <p>PCSN I: 7.6.2 "Sites and elements of special archaeological, historical, cultural or spiritual value shall be protected".</p> <p>PCSN I, Appendix 2: 7.6.3 "Relevant knowledge and scientific insight regarding trees outside forests supplied by third parties shall be included in the monitoring and review cycle (<i>Appendix 1</i>).".</p> <p>PCSN I: 7.6.5 "Anyone in possession of documents of ownership and usage rights should be involved in the drafting of the management plan".</p> <p>PCSN I, Appendix 2: 7.6.6 "The owner/manager shall be open to contributing towards scientific research on sustainable forest management".</p>

		Compliance: Conformity Justification: The Standard includes requirements to respect socio-economic functions of forests (7.6.1-7.6.6). Those are also supported by the requirements for the content of the management plan (Appendix 1)..
8.6.2 The standard requires that adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.	YES	PCSN I: 7.6.1 "The forest shall be open and at least be accessible for recreational purposes on foot via the existing paths and roads. Restrictions to access areas shall be permitted in order to protect privacy and personal surroundings, to protect special plants, animals or habitats and other special elements such as archaeological monuments, for the safety of visitors and workers, and for wildlife refuge areas". Compliance: Conformity Justification: The Standard ensure public access to forests and defines cases where the public access can be restricted (7.6.1).
8.6.3 The standard requires that sites with recognised specific historical, cultural or spiritual significance and areas fundamental to meeting the needs of indigenous peoples and local communities (e.g. health, subsistence) shall be protected or managed in a way that takes due regard of the significance of the site.	YES	PCSN I: 7.6.2 "Sites and elements of special archaeological, historical, cultural or spiritual value shall be protected". Compliance: Conformity Justification: The Standard requires protection of sites with historical, spiritual and cultural significance (7.6.2).
8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples.	N/A	PCSN I: 5.4 "The owner/manager communicates with the stakeholders, and explains the objectives and management plan." PCSN I: 7.6.5 "Anyone in possession of documents of ownership and usage rights shall be involved in the drafting of the management plan". PCSN I: 7.6.1 "The forest shall be open and at least be accessible for recreational purposes on foot via the existing paths and roads. Restrictions to access areas shall be permitted in order to protect privacy and personal surroundings, to protect special plants, animals or habitats and other special elements such as archaeological monuments, for the safety of visitors and workers, and for wildlife refuge areas". PCSN I: 7.6.2 "Sites and elements of special archaeological, historical, cultural or spiritual value shall be protected". Compliance: Not applicable Justification: The Standard includes requirements supporting local communities, relating to recreation and access to forests (7.6.5), protecting sites of cultural / spiritual importance (7.6.2). The standard also requires to communicate to local stakeholders (5.4) and include those with user's rights in the management planning (7.6.5). The requirement of ensuring health and well-being of local populations is not relevant to the conditions of the Netherlands as this is the primary role of the government

		<p>to provide education, health-care, infrastructure, social safety and security, etc.</p> <p>All those society functions are sufficiently covered by the Government as for example demonstrated by the World Happiness report, an independent research report undertaken for the United Nations that takes Health and well-being into account and where the Netherlands ranks amongst the 5 top countries: https://happiness-report.s3.amazonaws.com/2021/WHR+21.pdf</p>
8.6.5 The standard requires that traditional knowledge and recognised best practice for agroforestry & TOF management be utilized. Equitable sharing of the benefits arising from the utilizations of such knowledge, innovations and practices shall be encouraged.	YES	<p>PCSN I: 5.4 "The owner/manager communicates with the stakeholders, and explains the objectives and management plan."</p> <p>PCSN I: 7.6.5 "Anyone in possession of documents of ownership and usage rights should be involved in the drafting of the management plan".</p> <p>PCSN I, Appendix 2: "The owner/manager shall utilize traditional knowledge and recognized best practice for agroforestry & TOF management. Sharing the benefits arising from the utilization of such knowledge, innovations and practices shall be encouraged".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard requires to utilise traditional knowledge and best practice for ToF and agroforestry management.</p>
8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples.	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>Within the Dutch conditions, it is not the role or responsibility of the forest owner to stimulate the local economy through training and employment of local people. That role is guaranteed by the government who provides for economic development of rural areas. The efficiency of the governmental work and economic development is the s is demonstrated situation does not mean he is not contributing to the local economy or does not hire local people to work in the forest, but it is not his obligation to do so. That role is again taken by the government who provides for a strong economic situation proved by a high employment rate of around 78%, being top 3 of the OECD countries: https://www.statista.com/statistics/268127/employment-rate-in-selected-industrialized-countries/, and a high GDP position: https://en.wikipedia.org/wiki/List_of_countries_by_GDP_(nominal).</p>
8.6.7 The standard requires that forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.	YES	<p>PCSN I, Appendix 2: 7.6.6 "The owner/manager shall be open to contributing towards scientific research on the management of trees outside forests".</p> <p>PCSN I, Appendix 2: "7.6.3 Relevant knowledge and scientific insight regarding trees outside forests supplied by third parties shall be included in the monitoring and review cycle (Appendix 1)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirements promoting research activities (7.6.6) and for usage of the scientific knowledge (7.6.3).</p>

9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		
9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.	YES	<p>PCSN I, 8.1.1: "The owner shall monitor his area on ecological, social and economic effects. The results of this monitoring will be used in the planning".</p> <p>PCSN I: Appendix 1:</p> <p>"6. Monitoring and Review: All elements shall be subject to review, with the exception of section 5. Management plan attachments</p> <p>The management plan shall be reviewed and updated every ten years.</p> <p>There shall be interim reviews following natural disasters (storm, fire, disease, plague)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring of forest resources and review as an integral part of the 10-years planning process (8.1.1, Appendix 1).</p>
9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	YES	<p>PCSN I, 8.1.2: "The owner shall regularly monitor the health of the certificated area, especially on biotic and abiotic factors that could influence the health and vitality of the ecosystem. One can think of pests, diseases, grazing, fire and harm caused by environment factors, air population or management activities".</p> <p>PCSN I: Appendix 1:</p> <p>"6. Monitoring and Review: All elements shall be subject to review, with the exception of section 5. Management plan attachments</p> <p>The management plan shall be reviewed and updated every ten years.</p> <p>There shall be interim reviews following natural disasters (storm, fire, disease, plague)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard includes requirement for monitoring and review of forest resources as a part of the management planning (10 years) and monitoring of health (8.1.2, Appendix 1).</p>
9.1.3 The standard requires that where it is the responsibility of the forest owner/manager and included in forest management, the use of non-wood forest products, including hunting and fishing, shall be regulated, monitored and controlled.	YES	<p>PCSN I, 8.1.3: "Where applicable, the owner will regulate, monitor and control the use of non-forest products, such as the sale of game".</p> <p>PCSN I: Appendix 1:</p> <p>"6. Monitoring and Review: All elements shall be subject to review, with the exception of section 5. Management plan attachments</p> <p>The management plan shall be reviewed and updated every ten years.</p> <p>There shall be interim reviews following natural disasters (storm, fire, disease, plague)".</p> <p>Compliance: Conformity</p>

		Justification: Both wood and non-wood production are subject to the management planning and as such are also subject to the monitoring and review (8.1.3, Appendix 1).
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	PCSN I, 8.1.4: "The owner shall regularly monitor the working conditions and adjust them if necessary". Compliance: Conformity Justification: The monitoring of working conditions is delivered through requirement 8.1.4 as well as by adherence to the Forests and Nature Health and Safety at Work Manual (https://www.stigas.nl/agroarbo/bos-en-natuur) that also requires regular monitoring of the working conditions and provides Checklists for those tasks.
9.2 Internal audit		
9.2.1 Objectives		
The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system		
a) conforms to <ul style="list-style-type: none"> the organisation's requirements for its management system; the requirements of the national sustainable forest management standard 	YES	PCSN I: "8.2.1 Objectives The owner shall organise an internal audit at least once a year, during which information will be provided as to whether the management system: (a) Complies with: - The requirements set by the owner for its management system - The requirements of PCSN I b) Is implemented and managed in an effective manner". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.
b) is effectively implemented and maintained.	YES	PCSN I: "8.2.1 Objectives The owner shall organise an internal audit at least once a year, during which information will be provided as to whether the management system: (a) Complies with: - The requirements set by the owner for its management system - The requirements of PCSN I b) Is implemented and managed in an effective manner". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirement.
9.2.2 Organisation		
The standard requires that the organisation shall:		

a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	YES	<p>PCSN I: "8.2.2 Organisation of the internal audit The owner shall:</p> <p>a) Implement an audit programme that includes the frequency, methods, responsibilities, planning and reporting, the importance of internal processes and the results of previous audits.</p> <p>b) define the audit criteria and scope for each audit</p> <p>c) Select auditors to carry out the audits taking into account objectivity and impartiality</p> <p>d) Ensuring that the results of the audits are shared with relevant management</p> <p>e) Retain documented information of the audit results as evidence of the implementation of the audit programme".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
b) define the audit criteria and scope for each audit;	YES	<p>PCSN I: "8.2.2 Organisation of the internal audit The owner shall:...</p> <p>b) define the audit criteria and scope for each audit".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	YES	<p>PCSN I: "8.2.2 Organisation of the internal audit The owner shall:...</p> <p>c) Select auditors to carry out the audits taking into account objectivity and impartiality".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
d) ensure that the results of the audits are reported to relevant management;	YES	<p>PCSN I: "8.2.2 Organisation of the internal audit The owner shall: ...</p> <p>d) Ensuring that the results of the audits are shared with relevant management".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.</p>
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	<p>PCSN I: "8.2.2 Organisation of the internal audit The owner shall:...</p> <p>e) Retain documented information of the audit results as evidence of the implementation of the audit programme".</p> <p>Compliance: Conformity</p>

		Justification: The Standard (PCSN I) includes requirements for internal audit that are satisfying the PEFC requirements.
9.3 Management review		
9.3.1 The standard requires that an annual management review shall at least include		
a) the status of actions from previous management reviews;	YES	PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include: a) Action points from previous management reviews; b) changes in internal or external processes relevant to the management system; c) Information on the owner's performance. In any case, trends will be included: - Deviations and solutions - The results of monitoring - The results of audits (d) Opportunities for continuous improvement". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.
b) changes in external and internal issues that are relevant to the management system;	YES	PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include:... b) changes in internal or external processes relevant to the management system". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.
c) information on the organisation's performance, including trends in: • nonconformities and corrective actions; • monitoring and measurement results; • audit results;	YES	PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include..." c) Information on the owner's performance. In any case, trends will be included: - Deviations and solutions - The results of monitoring - The results of audits". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.
d) opportunities for continual improvement	YES	PCSN I: "8.3.1 The owner shall carry out an annual management review. This review shall at least include:... (d) Opportunities for continuous improvement".

		Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.
9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.	YES	PCSN II: "8.3.2 The results of the management review shall include decisions that allow for continuous improvements and possible changes of the management system". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	YES	PCSN II: "8.3.3 The owner shall retain documented information to prove that a management review has been carried out". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management review that are satisfying the PEFC requirements.
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	YES	PCSN I: "9.1.1 When an anomaly is detected, the owner shall: (a) Respond and, where applicable i. Take action to resolve the deviation ii. Deal with the consequences b) Assess whether any action is required to resolve specific causes of the non-compliance so that it does not occur again. The owner does this by: i. Assessing the deviation ii. Determining the causes of the deviation iii. Determine whether similar deviations exist or may arise; c) Assess the effectiveness of any corrective action taken d) Make changes in the management system as required". Compliance: Conformity Justification: The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements. Observation

		The document is inconsistently using the terms for “non-conformities” as it uses in chapter 9.1.1 terms “deviations” or “anomaly”
<p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p> <p>i. reviewing the nonconformity;</p> <p>ii. determining the causes of the nonconformity;</p> <p>iii. determining if similar nonconformities exist, or could potentially occur;</p>	YES	<p>PCSN I: “9.1.1 When an anomaly is detected, the owner shall:...</p> <p>b) Assess whether any action is required to resolve specific causes of the non-compliance so that it does not occur again. The owner does this by:</p> <p>i. Assessing the deviation</p> <p>ii. Determining the causes of the deviation</p> <p>iii. Determine whether similar deviations exist or may arise;...”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
c) implement any action needed;	YES	<p>PCSN I: “9.1.1 When an anomaly is detected, the owner shall:</p> <p>(a) Respond and, where applicable</p> <p>i. Take action to resolve the deviation</p> <p>ii. Deal with the consequences”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
d) review the effectiveness of any corrective action taken;	YES	<p>PCSN I: “9.1.1 When an anomaly is detected, the owner shall: ...</p> <p>c) Assess the effectiveness of any corrective action taken”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
e) make changes to the management system, if necessary.	YES	<p>PCSN I: “9.1.1 When an anomaly is detected, the owner shall:...</p> <p>d) Make changes in the management system as required”.</p> <p>Compliance: Conformity</p> <p>Justification:</p>

		The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	<p>PCSN I: "The actions taken by the owner to resolve the nonconformities shall be appropriate".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
10.1.3 The standard requires that the organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	YES	<p>PCSN I: "9.1.3 The owner shall retain documented information as evidence of:</p> <p>(a) The nature of the deviation and the actions taken as a result</p> <p>(b) the results of the resolution.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
b) the results of any corrective action.	YES	<p>PCSN I: "9.1.3 The owner shall retain documented information as evidence of:</p> <p>(a) The nature of the deviation and the actions taken as a result</p> <p>(b) the results of the resolution.".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for management of non-conformities that are satisfying the PEFC requirements.</p>
<p>10.2 Continual improvement</p> <p>The standard requires that the suitability, adequacy and effectiveness of the sustainable forest management system and the sustainable management of the forest shall be continuously improved.</p>	YES	<p>PCSN I: "9.2 The applicability, adequacy, and effectiveness of the management system and the sustainable management of the forest and/or the trees shall be continually improved".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The Standard (PCSN I) includes requirements for continuous improvement.</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC ST 1003: Appendix 2/C		
<p>A2/C</p> <p>The standard requires that management of the agricultural components within a TOF</p>	YES	PCSN I, Appendix 2, Rural ToF: "The owner/manager shall utilize traditional knowledge and recognized best practice for agroforestry & TOF management. Sharing

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
system shall follow good agricultural practice.		<p>the benefits arising from the utilization of such knowledge, innovations and practices shall be encouraged”.</p> <p>PCSN I, Appendix 2, Urban ToF: “The owner/manager shall utilize traditional knowledge and recognized best practice for TOF management. Sharing the benefits arising from the utilization of such knowledge, innovations and practices shall be encouraged”.</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The standard requires to recognize best practice for agroforestry and ToF management (Appendix 2)</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC ST 1003: Appendix 2/D		
Appendix 2, D Exempted requirements	N/A	<p>Compliance: Not applicable</p> <p>Justification:</p> <p>PCSN I does not provide any exemptions for ToF that are allowed as “potential Exceptions” in PEFC ST 1003:2018, Appendix 2/D.</p> <p>Therefore, all PEFC requirements in PEFC ST 1003:2018 are applicable and have been used in the assessment.</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
PEFC ST 1003: Appendix 2/D		
<p>Appendix 2, E</p> <p>If the national standard-setting process agrees to develop specific requirements and/or standard(s) for TOF, all PEFC ST 1003:2018 requirements are applicable with the potential exception of some requirements in the case of TOF-agriculture extensive and/or TOF-settlement extensive system. In this case, the standard-setting process must build agreement around the appropriate threshold between “intensive” or “extensive” TOF systems, based on clear rationale. The eligibility of a particular TOF system must be clearly communicated within standard(s).</p> <p>When establishing the threshold between the intensive and extensive categorisation of TOF systems, the national standard-setting process should consider at least:</p>	NO	<p>PCSN I: Appendix 2: “Trees Outside Forests are divided into four categories: urban and rural, and for both a distinction is made between intensive and extensive use. To determine whether the area can be identified as ‘settlement’, we look at whether it falls within the boundaries of the ‘build environment’ (bebouwde kom) set by the municipality. If not, it falls under agriculture.</p> <p>The following scheme has to be followed to determine which requirements apply to the area to be certified whereby the whole area will be taken into account. For example, a municipality will take the entire municipal boundary to determine whether the crown coverage of their avenues is higher or lower than 30% of the entire area and a farmer will take his entire field and not just the trees. If an area to be certified is larger than 0.5 ha and has a canopy cover higher than 30%, the forest standard applies.</p> <p>Turnover means the annual turnover in Euros and also the sale of whole trees (e.g. as Christmas trees) counts as turnover of wood”.</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>a) size of management unit</p> <p>b) tree cover/hectare</p> <p>c) economic value of production</p> <p>d) intensity of management</p> <p>e) scale of cultural, ecological and conservation value</p>		<p>Compliance: Minor non-conformity</p> <p>Justification:</p> <p>PCSN I does define four categories of ToF when two of them “rural extensive” and “urban extensive” are eligible for PEFC certification. The standard defines the following criteria to differentiate between “extensive” and “intensive”:</p> <ul style="list-style-type: none"> - size of ToF to be certified (<0.50 ha); - tree cover (<30 % tree cover); - turnover (<50 %). <p>The minor non-conformity has been assigned based on the following arguments:</p> <ul style="list-style-type: none"> a) it is not clear how the threshold of 0.50 ha will be applied. Is it a cumulative area of ToF on a management unit or a single plot of ToF. As PCSN I refers to “area to be certified” it can be assumed that the total (cumulative) area of ToF is less than 50 %. It is very unlikely that any farm unit or any municipality would apply for PEFC certification to obtain and benefit from less than 0.50 ha of certified ToF. b) The criterion of “tree cover” has very limited value in differentiation between intensive and extensive management as it applies to the coverage of the whole “municipality area” or “farm”. It is very unlikely, that “tree coverage” of the whole municipal area or the whole agriculture farm would exceed 30 %, especially when the area of the ToF shall be smaller than 0.50 ha. c) The criterion of turnover is ambiguous. It is rather clear that income from wood refers to the sale of wood (or trees) from the ToF. However, it is not clear what the total turnover would be, is it only income from the ToF area or a budget of the whole municipality or income of the whole farm. It is very unlikely that wood/trees income would exceed 50 % of the whole municipality budget or a farm turnover when the certified area is limited by 0.50 ha. d) A “management intensity” criterion has not been defined; e) A criterion of “scale of cultural, ecological and conservation value” has not been defined. <p>However, it should be noted that Section E of Appendix 2 (PEFC ST 1003:2018) refers to the categorization of the ToF for a single purpose, i.e. potential exception of some requirements for “extensive” types of the ToF. PCSN I does not apply any exception from the requirements included in PEFC ST 1003:2018. Therefore, regardless of whether the ToF are classified as “extensive” or “intensive”, the PCSN requirements they would still comply with the PEFC requirements.</p>

Annex E: Detailed assessment of requirements for forest management certification bodies

The assessment is only carried out for certification bodies operating forest management certification. The certification bodies, operating COC certification shall comply with PEFC ST 2003:2020.

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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 PCSN IV requires certification body's compliance with ISO 17021-1." PCSN IV: "4.2 Impartiality All the principles given in clause 4.2 of ISO/IEC 17021-1 shall apply". Compliance: Conformity Justification: The document requires impartial and independent certification body that complies with ISO/IEC 17021-1 requirements for impartiality. The PEFC Netherlands is the only governing / standard setting body of the scheme. This excludes any CB from being the governing or decision-making body of the scheme.
2.	Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021?	Annex 6, 3.1	YES PCSN IV: uses an identical structure with ISO/IEC 17021-1 and for either 1st, 2nd or 3rd level of the document it includes a statement that the certification shall comply with the requirements of ISO/IEC 17021-1. Example: "All the principles given in clause 6 of ISO/IEC 17021-1 shall apply". Compliance: Conformity Justification: The document requires compliance with ISO 17021-1. Observation There is some inconsistency in using the references. For example, under chapter 5 (Structural requirements), PCSN IV states "All the principles given in clause 5.1 of ISO/IEC 17021-1 shall apply". However, this results in a situation that chapters 5.2 and 5.3 of ISO/IEC 17021-1 are not covered by the PCSN reference. In addition, PCSN IV should refer to "requirements" or "clauses" as "Principle" is too general term for this purpose. This inconsistency was not classified as non-conformity because PCSN II clearly indicates the accreditation by an IAF member and the accreditation body will always request compliance with all requirements of ISO 17021-1.
3.	Does the scheme documentation require that certification bodies carrying	Annex 6, 3.1	YES PCSN IV: "7.2.1.6.1 The certification body shall ensure that auditors can demonstrate that they:

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?		<p>a) Are aware of the latest version of the PCSN I standard;</p> <p>b) Are familiar with the socio-demographic and cultural aspects of the Dutch forest;</p> <p>c) Have knowledge of audit principles, audit practice and audit techniques;</p> <p>d) Have knowledge of organisations such as the size of an organisation, its structure, functions and relationships, general business processes and related terminology;</p> <p>e) Are familiar with the applicable laws and regulations</p> <p>f) Have knowledge of the Dutch forestry sector as regards terminology, tree species and forest management techniques (also in relation to new technologies)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires competencies for auditors that is the primary mechanism how to ensure competencies of the whole certification body. In addition, PCSN II also includes requirements for education, training, work experience, audit experience and monitoring of auditors.</p>
4.	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 certification?	Annex 6, 3.1	<p>YES</p> <p>PCSN IV: "7.2.1.6.1 The certification body shall ensure that auditors can demonstrate that they:</p> <p>a) Are aware of the latest version of the PCSN I standard;...".</p> <p>PCSN IV: "7.2.1.2 Forest management training: The certification body shall ensure that auditors have participated in an education programme recognised by PEFC Netherlands or the PEFC Council within the last two years".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires knowledge of the certification standard (PCSN I). The good understanding of the whole PEFC system is also delivered through the mandatory training organised by the PEFC Netherlands.</p>

5.	Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	Annex 6, 3.2	YES	<p>PCSN IV: 7.2.1.1 Education The certifying body shall ensure that the auditor carrying out the field audit holds an MSc/BSc degree in the field of forest management. If the auditor has an MSc/BSc degree in another subject, he must have taken additional subjects and/or courses in the field of forest or tree management.</p> <p>PCSN IV: "7.2.1.2 Forest management training: The certification body shall ensure that auditors have participated in an education programme recognised by PEFC Netherlands or the PEFC Council within the last two years".</p> <p>PCSN IV: "7.2.1.3 Audit training: The certifying body shall ensure that all auditors have successfully completed an ISO 9001 Lead Auditor course".</p> <p>PCSN IV: "7.2.1.4 Work experience: The certifying body shall ensure that the auditor has at least two (2) years of working experience in forest management, or in the forest and wood industry".</p> <p>PCSN IV: "7.2.1.5 Audit experience:</p> <p>7.2.1.5.1 For an auditor's initial qualification, the certification body shall ensure that the auditor has conducted forest management audits for at least two (2) individual client organisations, or one (1) group manager with at least two (2) group members under the direction of a qualified auditor, within the past three (3) years.</p> <p>7.2.1.5.2 To maintain the auditor's qualification, the certification body shall ensure that the auditor annually performs a minimum of five (5) external audits, including a minimum of one (1) forest management audit annually, whereby the sum of the number of audits shall be at least seven (7) working days".</p> <p>PCSN IV: "7.2.1.6 Competences: 7.2.1.6.1 The certification body shall ensure that auditors can demonstrate that they:</p> <ul style="list-style-type: none"> a) Are aware of the latest version of the PCSN I standard; b) Are familiar with the socio-demographic and cultural aspects of the Dutch forest; c) Have knowledge of audit principles, audit practice and audit techniques; d) Have knowledge of organisations such as the size of an organisation, its structure, functions and relationships, general business processes and related terminology; e) Are familiar with the applicable laws and regulations f) Have knowledge of the Dutch forestry sector as regards terminology, tree species and forest management techniques (also in relation to new technologies)". <p>PCSN II: "7.2.1.6.2 The certification body shall produce evidence of annual monitoring of forest management auditors in order to assess the auditors' training needs".</p> <p>Compliance: Conformity</p> <p>Justification:</p>
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No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			PCSN II includes comprehensive and detailed requirements for auditors, including education, training, work experience, audit experience, areas of competencies and monitoring of auditors performance.
6.	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 PCSN IV: 7.2.1.3 The certifying body shall ensure that all auditors have successfully completed an ISO 19011 course". Compliance: Conformity Justification: The document requires the auditors to successfully complete ISO 10911 training. In addition, it should be noted that ISO 19011:2002 referenced in Annex 6 of the PEFC Council Technical document has been incorporated in IOS 17021:2011, previous version of ISO 17021-1. Therefore, ISO/IEC 17021-1to which PCSN IV makes mandatory reference satisfies the PEFC requirement as it includes the general criteria for auditors included in ISO 19011:2002.
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [1]	Annex 6, 3.2	YES See PEFC requirement 5. Compliance: Conformity Justification: PCSN IV includes comprehensive and detailed requirements for auditors, including education, training, work experience, audit experience, areas of competencies and monitoring of auditors performance.
Certification procedures			
8.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	YES ISO 17021-1: "10.1 The certification body shall establish, document, implement and maintain a management system that is capable of supporting and demonstrating the consistent achievement of the requirements of this International Standard." Compliance: Conformity Justification: The compliance is delivered through ISO/IEC 17021-1that requires the certification body to establish management system, including documentation.
9.	Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible	Annex 6, 4	YES PCSN IV requires compliance with ISO 17021-1. See also PEFC requirement 2. Compliance: Conformity Justification:

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	with the requirements defined in ISO 17021?		The document requires compliance with ISO 17011-1.
10.	Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4 YES	<p>PCSN IV, 7.2.1.3: "The certifying body shall ensure that all auditors have successfully completed an ISO 19011 course".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN requires that auditors successfully completed training based on ISO 19011.</p> <p>In addition, it should be noted that ISO 19011:2002 referenced in Annex 6 of the PEFC Council Technical document has been incorporated in ISO 17021:2011, previous version of ISO 17021-1. Therefore, ISO/IEC 17021-1 to which PCSN IV makes mandatory reference satisfies the PEFC requirement as it includes the general criteria for auditors included in ISO 19011:2002.</p> <p>Observation</p> <p>ISO 19011 standard is referenced in the PCSN IV document. However, it is not listed amongst the "normative references".</p>
11.	Does the scheme documentation require that certification body shall inform the relevant PEFC National Governing Body about all issued forest management certificates and changes concerning the validity and scope of these certificates?	Annex 6, 4 YES	<p>PCSN IV: "8.4.2 The certification body shall inform the client organisation that it is required to provide information to PEFC Netherlands or the PEFC Council. In order to meet the confidentiality requirements of ISO/IEC 17021-1, the certification body shall have the written consent of the client organisation for relaying information to PEFC Netherlands or the PEFC Council".</p> <p>Notification contract: Article 2/3</p> <p>"The PEFC Notified Certification Body is obliged to:</p> <p>3. Provide PEFC Nederland immediately and truthfully with information on every forest management certificate issued to an organization having its registered office in The Netherlands and /or inform of any changes to already issued certificates within the range of data as specified by PEFC Nederland. A copy of all issued or modified certificates will be sent to PEFC Nederland accompanied by the Issued certificates report (Appendix 4 to the Guideline)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>PCSN IV requires that the certification body shall have client's consent that it can provide information to PEFC Netherlands or to the PEFC Council. This requirement itself does not ensure that the certification provides the requested data to PEFC Netherlands. However, the explicit requirement is covered by the notification contract between PEFC Netherlands and certification bodies.</p>
12.	Does the scheme documentation require that	Annex 6, 4 YES	PCSN IV, 9.3.1.3.3: "The Phase 2 audit shall assess the effectiveness of PCSN I implementation on the

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?		defined forest area and the use of the PEFC trademarks according to PCSN VI". Compliance: Conformity Justification: PFCS IV requires the certification shall also evaluate the client's usage of the PEFC Logo.
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4 YES	ISO 17021-1: "9.1.2.2 The audit programme shall include a two-stage initial audit, surveillance audits in the first and second years, and a recertification audit in the third year prior to expiration of certification". ISO 17021-1: "9.1.2.3 Surveillance audits shall be conducted at least once a calendar year. The date of the first surveillance audit following initial certification shall not be more than 12 months from the certification date". Compliance: Conformity Justification: The compliance is delivered through the mandatory reference to ISO 17021-1.
14.	Does a maximum period for re-assessment audit not exceed five years for forest management certifications?	Annex 6, 4 YES	PCSN IV: 9.1.3.2 The certificate is valid for a maximum period of five (5) years. The certification body may permanently withdraw or temporarily suspend the certificate in the interim. The decision to withdraw or suspend shall be communicated in writing to the client organisation, together with the reasons for the decision. A certification audit must take place every five years in order to extend the validity of the certificate". Compliance: Conformity Justification: The document requires a five-years certification cycle.
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4 YES	PCSN IV: " 8.1.2 The certifying body shall make a summary of the audit report within four weeks. This summary shall be made publicly available by the client organisation. While confidential information may be omitted in the summary, it shall at least include: a) Information concerning the client organisation b) The scope of the audit, the objectives and the process c) The audit plan (date, locations, audit team) d) Audit results (main findings, nonconformities)" Compliance: Conformity Justification: The document requires public availability of certification report summaries within the timescale of four weeks and satisfy both the PEFC requirement as well as its interpretation ³ .

³ The "applicable requirements defined by a certification scheme" shall cover, amongst others, "that the summary shall be made available to any interested party on request within a defined timescale". (<https://podio.com/pefc->

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
16.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	<p>YES</p> <p>PCSN IV: "9.4.10.5 The audit evidence to determine compliance with the requirements of the PCSN I shall include, where applicable, relevant information from external parties (e.g. government agencies or conservation organisations)."</p> <p>PCSN IV: "9.3.1.3.4 The phase 2 audit shall include sufficient consultation with local stakeholders to ensure that all relevant matters are identified and related to compliance with the requirements of the PCSN I standard".</p> <p>PCSN IV: "9.3.1.3.5 The certification body shall take into account any remarks or objections received from stakeholders".</p> <p>PCSN IV: "9.3.1.3.6 The certification body shall publicly provide information on the different options available for stakeholders to provide input. The certification body shall also involve stakeholders in other parts of the certification process (e.g. as observers in an on-site audit), but shall make clear what that role is".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires to use information from external parties and also requires stakeholders consultation.</p> <p>The PEFC Council's interpretation of the requirement clarifies that the "audit must, amongst other relevant information, include sufficient consultation with external stakeholders to ensure that all relevant issues are identified relating to compliance with the requirements of the standard"⁴.</p>
17.	Does the scheme documentation include additional requirements for certification procedures? [^{*1}]	Annex 6, 4	<p>YES</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document includes additional requirements for planning and conducting audits, multi-site certification, etc.</p>
Accreditation procedures			

[international/pefc-standards-interpretations-and-clarifications/apps/standards-interpretations-and-clarification/items/2\)](https://international.pefc-standards-interpretations-and-clarifications/apps/standards-interpretations-and-clarification/items/2)

⁴ <https://podio.com/pefc-international/pefc-standards-interpretations-and-clarifications/apps/standards-interpretations-and-clarification/items/1>

No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
18.	Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	Annex 6, 5	YES	<p>PCSN IV: "5.2 The certification body shall have a valid accreditation issued by a national accreditation body. The accreditation shall be issued by an accreditation body that is a member of the European co-operation for Accreditation and/or the International Accreditation Forum and which operates in accordance with the procedures described in ISO 17011:2004. In the Netherlands, this can be the Raad van Accreditatie (Dutch Accreditation Council)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document refers to an accreditation body that is a member of IAF and IAF by its statutes only accepts national accreditation bodies (13.1).</p>
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	YES	<p>PCSN IV: " 8.2.3 The certification body will add the accreditation body's logo to the certificate as well as the date of issue, expiry date or recertification date. The effective date on the certificate is always after the date of the certification decision".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document requires accredited certification and accreditation mark/symbol being placed on the certificate.</p>
20.	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?	Annex 6, 5	YES	<p>PCSN IV: "5.2 The certification body shall have a valid accreditation issued by a national accreditation body. The accreditation shall be issued by an accreditation body that is a member of the European co-operation for Accreditation and/or the International Accreditation Forum and which operates in accordance with the procedures described in ISO 17011:2004. In the Netherlands, this can be the Raad van Accreditatie (Dutch Accreditation Council)".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document refers to an accreditation body that is a member of IAF and complies with ISO 17011.</p>
21.	Does the scheme documentation require that certification body undertake forest management certification as "accredited certification" based on ISO 17021 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	YES	<p>PCSN IV: " 8.2.3 The certification body will add the accreditation body's logo to the certificate as well as the date of issue, expiry date or recertification date. The effective date on the certificate is always after the date of the certification decision".</p> <p>Notification contract, Article 2/1-2:</p> <p>"The PEFC Notified Certification Body is obliged to:</p> <ol style="list-style-type: none"> 1. Have and keep valid accreditation issued in compliance with the PCSN standard and to inform PEFC Nederland immediately about any changes in the accreditation. The PEFC Notified Certification Body will provide, at the beginning of each year as well as each time it is so requested, updated evidence that it still meets the requirements of valid accreditation.

No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>2. Carry out the forest management certification against PCSN I within the scope of the valid accreditation".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The document does not explicitly require that the certification shall be carried out within the scope of accreditation (accredited certification).</p> <p>However, the document includes a requirement for accreditation body's logo to be placed on the certificate. This ensures that the certificate is issued within a scope of valid accreditation.</p> <p>The requirement is fully covered by the notification contract between PEFC Nederland and certification bodies</p>
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	<p>YES</p> <p>PCSN IV: "5.3 Certification bodies shall have a notification issued by PEFC Nederland".</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The scheme documentation requires PEFC notification of certification bodies.</p>
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	<p>YES</p> <p>Compliance: Conformity</p> <p>Justification:</p> <p>The notification contract between PEFC Netherlands and certification bodies does not include any provisions that could be deemed discriminatory.</p>

Annex E: Stakeholder's representation in the Forum

Name	Organisation	Stakeholder Category
Ronald van den Brink	Gemeente Amsterdam (municipalities)	Trees Outside Forest
Erik Bakker	Gemeente Zwolle (municipalities)	
Reinier Engbers	Landgoed Heksenweg (private forests)	Forest Owner
Gerard Koopmans	Bosgroepen (private forests)	
Harrie Hekhuis	Staatsbosbeheer (state forests)	
Evan Buytendijk	Ingenieursbureau IEB	Certification Body
Sander van Riel	SKH	
Bianca Poelman Kraak	Houthandel VIPO	CoC from harvest to consumer
Piet Bergers	Zoogdierenvereniging/SoortenNL (E-NGO)	NGO
Jan ten Hopen	Soorten NL (E-NGO)	
Laurens Hoedemaker	Koninklijke Nederlandse Jagers Vereniging (hunters)	Non-timber user of the forest
Fransjan de Waard	Stichting voedselbosbouw.nl (non-timber products)	
Jacqueline Kraan	CNV (trade unions)	Employer and employee organizations
Fred van Anrooy	FNV (NGO – workers rights)	
Marjanke Hoogstra	Wageningen University and Research	Science

Albert
Schimmelpenninck

Chair

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

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

The PEFC Council had received no contribution or comments from stakeholders.

Annex H: Stakeholder's survey (FORM used in the survey)

Stakeholders questionnaire - PEFC endorsement of the PEFC Certification Scheme Netherlands (PCSN)

TJConsulting is a part of the Woodmotion Sarl, Luxembourg based consulting company. TJConsulting has been selected by the PEFC Council (www.pefc.org) to conduct an assessment of the PEFC Certification Scheme Netherlands (www.pefc.nl) that will be used as basis for the PEFC endorsement of the Dutch scheme.

A part of the Dutch scheme assessment is also evaluation of the standard setting / revision process of the scheme. In order to objectively assess various stakeholders engagement, TJConsulting also runs a survey amongst the Dutch stakeholders, their participation in and contribution to the process. That's why we need your opinion about the standard setting/revision process of the PEFC Certification Scheme Netherlands.

In addition to your opinion, we also collect some personal information about you such as your name and email address to be able to contact you for follow up if needed.

We securely store this data until the end of the PEFC endorsement process.

We respect your trust and protect your privacy, and therefore will never sell or share this data with any third parties.

By filling out this form you agree that we will process your data in line with our privacy policy.

If you have any questions or change your mind, contact Mr Jaro Tymrak via tymrak@tj-consult.com.

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Part I: General Information

Stakeholder name

Main Contact
First Name Last Name

E-mail ex: myname@example.com

Stakeholder group

- ☐ Forest owners / managers
- ☐ Forest industry
- ☐ Environmental NGOs
- ☐ Other NGOs
- ☐ Scientific and technological communities
- ☐ Workers and trade unions
- ☐ Government, including local authorities

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Part II: Announcement of the PCSN scheme revision process

Have you noticed announcement of start of the revision of the PCSN scheme (2019)

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Where did you notice the announcement?

- ☐ Direct mailing (letter/e-mail)
- ☐ At the PEFC Netherlands (www.pefc.nl) website
- ☐ PEFC Netherlands' Press release
- ☐ PEFC netherlands social media (facebook, twitter,...)
- ☐ Other

Did you have access to the standard setting procedures (rules for the revision of the PCSN scheme)

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Additional notes:

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Part III: Working Group / Forum for the standard revision

The PEFC Netherlands' multi-stakeholder body that was responsible for revision of the scheme

Have you been invited to nominate your representative to the Forum for the revision of the scheme?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

What was the form of the invitation?

- ☐ General invitation by PEFC NL website, press release, etc
- ☐ Direct invitation by e-mail/letters
- ☐ Other

Have you made a nomination to the Forum?

- ☐ YES
- ☐ NO

Has your nomination been accepted/rejected?

- ☐ YES
- ☐ NO

Have you received justification of rejection of your nomination?

- ☐ YES
- ☐ NO
- ☐ NOT SURE

Additional notes:

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Part IV: Public consultation

Have you noticed public consultation(s) on revised PCSN standards?

- ☐ Yes
☐ No
☐ NOT SURE

Where have you noticed invitation to public consultation?

- ☐ Direct mailing (E-mail/letter)
☐ PEFC NL or related websites
☐ PEFC NL press release
☐ Journals / magazines
☐ PEFC NL social media (Facebook, Twitter)
☐ Other

Have you submitted comments

- ☐ YES
☐ NO
☐ NOT SURE

Have your comments been considered?

- ☐ YES
☐ NO
☐ NOT SURE

Have you received / or had access to feedback on consideration of your comments?

- ☐ YES
☐ NO
☐ NOT SURE

Additional notes:

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Part V: Complaints

Have you submitted to PEFC Netherlands any complaint relating to the revision process?

- ☐ YES
☐ NO
☐ NOT SURE

Has the complaint been considered and resolved by the PEFC Netherlands?

- ☐ YES
☐ NO
☐ NOT SURE

Additional notes:

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Part VI: Participation in the Task Forces

This section only applies to those stakeholders who participated in the PEFC Netherlands' Forum

Was the work of the Forum organised in transparent way?

- ☐ YES
☐ NO
☐ NOT SURE

Has the Forum reached consensus on the revised standard?

- ☐ YES
☐ NO
☐ NOT SURE

Additional notes:

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Protection of personal data

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We might be asked by the PEFC Council (www.pefc.org) to disclose respondents to this survey as a part of their quality assurance mechanism.

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Annex I: Report from in-country visit

As a part of the assessment, the assessor conducted during 27-29 September 2021 an in-country visit with the following main objectives:

Objective of the visit

The objective of the visit was:

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

Program and timetable of the online interview

Date	27 Sep 2021	28 Sep 2021	29 Sep 2021
Day	Monday	Tuesday	Wednesday
Itinerary	Opening meeting	Stakeholders interview	Field trip ToF
	Stakeholders interview	Stakeholders' interview	Closing meeting

Stakeholders interviewed

Mr. Tymrak interviewed a number of stakeholders relevant to the development of the NVFCS scheme.

The following topics were discussed:

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

The following organizations have been met and interviewed:

PEFC Netherlands	Marten de Groot
Stakeholders	
SORTEN NL (E-NGO)	Jan ten Hopen
SKH (certification body)	Sander van Riel
Bosgroepen (private forest owners)	Gerard Koopmans
FNV (Trade Unions)	Fred van Anrooy

Key messages and findings

Stakeholders' feedback:

Standard setting:

- h) The invitation to the Forum was done on personal basis by a direct contact;
- i) The Forum was balanced and included all relevant stakeholders;
- j) The Forum's members were supported by PEFC Netherlands, provided with good information and coordination service;
- k) The process included sufficient discussion and good / professional atmosphere;
- l) Consensus was reached, issues were resolved by discussion and voting was thus unanimous,
- m) Time for the process was sufficient;
- n) The standard was tested on one FMU for both the sustainable forest management as well as for the ToF.

Critical issues within the revision:

- a) Dead wood,
- b) Protected species,
- c) Soil scarification,
- d) Set aside areas,
- e) Tree species mixture, native species,
- f) Working conditions.

Feedback on ToF:

- a) There are different types of ToF, the PCSN I standard tries to capture requirements for all of them;
- b) Conversion of ToF to non-ToF use;
- c) Input was received from people of landscaping sector;
- d) The areas and holdings are very small, this will create huge limitations for certification. The certification is mainly expected where a forest owner also manages ToF,
- e) Biodiversity can be achieved even in rows of trees.

Annex J: Comments from PEFC Council's internal review of the report

Chapter (Report) / PEFC requirement	PEFC Council comment	Assessor's response
4	Include the editorial corrections to the PCSN documentation (e.g. observations on page 22)	Added
4	Please provide the non-conformities listed within the text or in footnotes, it would be much clearer, easier to read and the references would be direct.	Added
Page 24	Please revisit these references, because they are not linked with the intended content or footnotes are not visible.	The references refer to chapter 6 which lists all the references
Page 27	It's just a proposed text, please feel free to amend. But it's important that ToF shall be always pilot tested, since there's no previous experience available.	Amended
8.2.3	Please include details about overlap between the online survey addresses and the field visit interviewees	There is not overlap between the online survey and stakeholders (face-to-face) interview as no comments have been received in the online survey.
Page 35	<p><i>PCSN I, 6.3.1.2: The owner/manager shall take action to prevent any unlawful activity as far as possible.</i></p> <p>The reason why I'm asking, because it is perfectly fine, if it refers to 3rd parties (e.g. preventing illegal logging or illegal waste deposition). Is this content maybe lost during the interpretation?</p>	The reference in the text was changed to 6.2.1.2 including reference and wording in Annex C.

36	Please revisit this and take into account the “scope of the standard” text on page 6 in PCSN I	The text was revisited to address the fact that PCSN I does not allow certification of forest plantations.
37, Annex C, 8.2.5	However the requirement does not conform with 8.2.5! Please revisit the evaluation of this requirement.	The text was revisited and conclusion changed to minor non-conformity
8.6	On the next page it's written that 2003 was not adopted. Please clarify.	PEFC ST 2003:2020 has not been formally adopted as a part of the scheme as a PCSN document (PEFC ST 2002:2020 was adopted as PCSN III. However, PEFC ST 2003:2020 is referenced in the PEFC notification contract for certification bodies and as such was “adopted” by PEFC Netherlands. In the proposal 4 working days were included. Please, implement the proposed number of working days in the field visit during the upcoming assessments
Annex I	In the proposal 4 working days were included. Please, implement the proposed number of working days in the field visit during the upcoming assessments	The tender proposal included “will take four (4) working days, including travel” .
8.5.1	Unfortunately, the ToF definition does not comply with the 1003. The development of the 4 categories are mandatory. Appendix 2, E. In this form the ToF annex is not eligible for endorsement due to the missing categories and the related, applicable requirements. I will approach PEFC Netherlands with this issue to discuss the options on how this could be addressed.	PEFC ST 1003:2018, Appendix 2 (Section 2) states that “If the national standard-setting process agrees to develop specific requirements and/or standard(s) for TOF, all PEFC ST 1003:2018 requirements are applicable with the potential exception of some requirements in the case of TOF-agriculture extensive and/or TOF-settlement extensive system. In this case , the standard-setting process must build agreement around the appropriate threshold between “intensive” or “extensive” TOF systems, based on clear rationale. The eligibility of a particular TOF system must be clearly communicated within standard(s).” This wording provides the “potential exception” for extensive ToFs as the clear and only objective why the standard shall provide threshold between “extensive” and “intensive”. As PCSN I does not apply any “exceptions”, Section 2 has been concluded as “Not applicable”. However, the assessor decided to respect the PEFC Council interpretation that Section 2 applies regardless of whether the “potential exceptions” have been applied or not and the assessment has been amended.

8.5.2.1 (PEFC requirement 8.4.12, Annex D)	We don't see why is this not applicable. The checklist justification suggests that there are responsibilities delegated in this regard, thus it's not clear, why this requirement can be assigned as not applicable by the NGB. PEFC ST 1003 allows that the extensive urban ToF areas do not need to meet this requirement, but it's applicable for the other 3 ToF categories.	The requirements for ToF do not regulate the control of wildlife population. Concerning the urban ToF, the control of wildlife population is not allowed in residential areas in principle and as such the requirement is not applicable. Concerning the agriculture ToF, the potential damages to ToF are negligible, taken into account the small-scale nature of the ToF (<0.50 ha) where regenerated trees are protected individually. The issue has been consulted with experts in both ToF management as well as nature conservation during the in-country visit who confirmed the justification for the requirement on control of the wild population not being applicable. (The justification in Annex D, 8.4.12 has been amended).
8.7.1	<p>"The scheme has not formally adopted PEFC ST 2003:2020 as a part of the PCSN scheme. However, the notification contract with certification bodies includes an explicit reference to PEFC ST 2003:2020.</p> <p>PEFC comment: Please include in the recommendation chapter the request to clarify the status of 2003:2020 in the Dutch System.</p>	<p>The PEFC Council does not require that the scheme shall formally adopt PEFC ST 2003:2020 as a part of the scheme documentation. In principle, it requires that the scheme using PEFC ST 2002:2020 shall also use PEFC ST 2003:2020 as requirements for certification bodies operating the PEFC chain of custody certification.</p> <p>PEFC Netherlands decided that it will make mandatory the use of PEFC ST 2003:2020 through the notification contracts with certification bodies that explicitly requires the certification bodies to comply with PEFC ST 2003:2020. The solution chosen by PEFC Netherlands fully meets the PEFC Council requirements and their objective.</p> <p>The fact that PEFC Netherlands has formally adopted PEFC ST 2002:2020 as a part of the PEFC documentation but not PEFC ST 2003:2020 should be considered as inconsistency in the PEFC Netherlands documentation rather than non-conformity with the PEFC Council requirements.</p> <p>Following the PEFC Council request, the issue was added to the Recommendation with the assessor's note.</p>



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