

Standard setting procedures no comments

Standard setting process no comments

### Forest management standard

General	Assessor's comment	A list of acronyms is missing;
	Response submitted	Addition of a list of acronyms at the beginnig of the document
General	Assessor's and PEFC comment	There are inconsistencies in the standard on the treatment of plantations that need to be clarified (7.3.6, 7.3.7). There is also a reference to afforestation that is strange, as the clause already refers to forest land (though in a degraded state), where afforestation is not applicable.
	Response submitted	<p>Different modifications aim to clarify these inconsistencies.</p> <p>The former requirement 7.2.13 has been deleted and the concepts it introduced are included in another requirement :</p> <ul style="list-style-type: none"> <li>- Integrated pest management in requirement 7.2.3 and its annex</li> <li>- the remark on plantations is managed by various additions</li> </ul> <p>1- clarification in the scope that the standard covers natural forests : <b>This standard applies to those forest titles that are part of the State's permanent forest estate and consist of unplanted natural forests. One or more titles form a forest management unit (FMU) intended for production and conceded by the State to an operator for a fixed duration.</b></p> <p>2- definition of natural forest added : <b>In the context of this standard, the natural forests are tropical, non-planted forests with intrinsic diversity in terms of horizontal and vertical structures, biodiversity, and genetic variability at the scale of the whole ecosystem.</b></p> <p>3- reminder of the exclusion of plantations from certification in requirement 7.3.7 <b>"Note: forest plantations are not eligible for certification."</b></p>
4.1	PEFC requirement	4.1. The requirements for sustainable forest management defined by regional, national or sub-national forest management standards shall: 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
	PAFC Standard & Documentation	none
	Assessor's minor non-conformity	No such overview is found, whereas part of the evidence for conformity is based on references to legislation, which is at least applicable for requirements 6.2.1a, 6.2.1b, 6.3.4.3, and 8.3.4 (further justification of sustainable yields).

Response submitted	Drafting of three national interpretation guides to the SFM standard for each of the countries concerned, mentioned in Annex 3 of the standard. Ajout d'une nouvelle annexe 3 qui présente les principaux textes de références dans les 3 pays ciblés par le standard régional.
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6.2.1	PEFC requirement	6.2.1 The standard requires that management plans shall be: b) appropriate to the size and use of the forest area;
	PAFC Standard & Documentation	Reference to national reglementation - Cameroon: art 29 law 1994 Congo: Art 75 law of 2020 Gabon: Art 20 and 21 law 16-2001
	Assessor's minor non-conformity	It is insufficiently ensured that the management document shall be appropriate to size and use of the forest area, as no reference is found in the standard, and the references to national legislation could not be assessed as they were not provided.

Response submitted	<p><b>Forest management documents definition is changed with the addition of 3 definitions : Management plan, five-year management document, operationnal plan</b></p> <p>Reference to these documents in requirement 6.1.1</p> <p><u>Forest management documents</u> : Forest management documents are all technical documents describing and planning forest management, including the official planning documents of the forest administration. They determine the objectives and limits of forest management and exploitation in a perspective of sustainability of activities beyond the duration of their concession and in order to limit their impacts.</p> <p>The terminology used in management documents varies according to the national legal and regulatory framework. They include planning documents at different time scales.</p> <p>These documents cover the entire forest resource of the appropriate geographical unit and describe the relevant management unit, taking into account other possible land uses.</p> <p><u>Management plan</u> : Long-term forest management document based on multi-resource inventories aimed at sustainable forest production and which takes into account local issues (economic, social and environmental) and other possible land uses.</p> <p>The management plan describes, within a FMU, the long-term sustainable management objectives, as well as the various management allocations (management series), and it determines and justifies the annual harvesting potential of the managed species or groups of species in order not to compromise the sustainability of the production beyond the period it covers.</p> <p>To ensure the sustainability of production, the management plan sets the duration of a rotation (the time between two phases of exploitation in the same area) and a minimum diameter, for each species, below which exploitation is not possible. These parameters are determined on the basis of inventory data and the specific recovery rates for each species. It defines the sequential order and any species that are prohibited from harvesting.</p> <p>A medium-term management document that defines the framework for the operation over an operational unit of more or less 5 years.</p>
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	<p><b>Five-year management document :</b> The 5-year management document is based on the results of the monitoring of the exploitation of the previous years to refine and update the rules of the management plan (species exploited, felling diameters, silvicultural operations), while respecting at least the thresholds set in the management plan.</p> <p><b>Operationnal plan :</b> Annual management document dedicated to the exploitation of a sub-part of the five-year management unit. Elaborated based on a systematic forest resources inventory within the limits of the annual allowable cut, the operational plan adjusts on a yearly basis the interventions according to the data collected on the ground. It presents the volume that is actually harvestable per species as well as the projected route of the road network and the projected locations of engineering structures.</p> <p>Annual management document dedicated to the exploitation of a sub-part of the five-year management unit. Elaborated based on a systematic forest resources inventory within the limits of the annual allowable cut, the operational plan adjusts on a yearly basis the interventions according to the data collected on the ground. It presents the volume that is actually harvestable per species as well as the projected route of the road network and the projected locations of engineering structures.</p>
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6.3.4.3	PEFC requirement	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. 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.
	PAFC Standard & Documentation	9.1.2 The organisation must - at the very least - comply with legal and regulatory requirements, including those of collective agreements where applicable and the ILO's fundamental conventions on working conditions.
	Assessor's comment	No provisions are found that where wages are below the living wage of a country (such as in Cameroon), steps are taken to increase wages towards a living wage level over time.
	Response submitted	<p><b>Amendment of requirement 9.1.2</b></p> <p>The organisation must - at the very least - comply with legal and regulatory requirements, including those of collective agreements where applicable and the ILO's fundamental conventions on working conditions <b>including minimum wage requirements.</b></p> <p><b>Note: All the requirements of paragraph 9.3 contribute to ensuring decent living conditions for the organization's workers and subcontractors, complementing this requirement.</b></p>

8.1.1	PEFC requirement	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.
	Assessor's comment	The wording in clauses 6.1.3, 7.1.2, and 7.1.3 is aiming at maintaining and not at enhancing or increasing forests and their

Response submitted	<p><b>Requirements amended</b></p> <p>6.1.3 The organisation must ensure that its forest management maintains <b>or increase</b> a harvestable volume of lumber and a species distribution that will sustain economic activity beyond the rotation in accordance with the management plan.</p> <p>7.1.2 In order to preserve the biodiversity present in the FMU, ecologically important forest areas must be identified, described and mapped, at least at the scale of the FMU and according to the intensity of harvesting. Appropriate measures to maintain the criteria for which they have been identified must be prescribed, adhered to and evaluated, in particular measures to maintain <b>or enhance</b> the natural connectivity of ecologically important forest areas with other important areas within and surrounding the FMU.</p> <p>7.1.3 Forest areas with significant soil and water protection functions must be identified, described and mapped, at least at the scale of the five-year management unit and according to the intensity of harvesting. Specific and appropriate measures to maintain <b>or enhance</b> the ecosystem services associated with these areas must be prescribed, adhered to and evaluated.</p>
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8.1.4	PEFC requirement	8.1.4 The standard requires that forest conversion 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 including consultation with affected stakeholders;
	PAFC Standard & Documentation	7.3.6 In the event of a forest conversion within the FMU, (...) The conversion must also: - Comply with national land use and forest management policies and regulations and comply with the management plan; Note: plantations established as a result of a forest conversion after 31 December 2010 are not eligible for certification."
	Assessor's minor non-conformity	It is insufficiently ensured that the land use policies include consultation with affected stakeholders. It shall be noted that when national / regional policy and legislation does not include requirements for consultation with affected stakeholders, the organisation shall include consultation with affected stakeholders. This could for instance apply in the case of road constructions, labour camps, log landings.

Response submitted	<p><b>Rewriting of requirement 7.3.6</b></p> <p>7.3.6 In the event of a forest conversion within the FMU, <b>it must be justified and:</b></p> <ul style="list-style-type: none"> <li>-Complies with national land use and forest management policies and regulations and comply with the management plan;</li> <li>-does not destroy forests with a significantly high carbon stock;</li> <li>-cannot exceed 5% of the production series area;</li> <li>-Cannot be located in conservation series.</li> <li>-Does not have negative impact on EIFA, culturally and socially significant areas, or other protected areas</li> <li>-Contributes to long-term conservation, economic and social benefits</li> <li>- <b>Includes consultation with affected stakeholders.</b></li> </ul>
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8.1.4	PEFC requirement	8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas;
	PAFC Standard & Documentation	7.3.6 In the event of a forest conversion within the FMU, (...) The conversion must also: - Contribute to enhance ecologically, socially or culturally important forest areas and/or other protected areas on the long term
	Assessor's minor non-conformity	It is insufficiently ensured that conversion shall not have negative impacts on the specific areas, the more as the wording "or" in the clause leaves the option open to have a contribution to the one function, while having negative impact on the other.
	Response submitted	<p><b>Rewriting of requirement 7.3.6</b></p> <p>7.3.6 In the event of a forest conversion within the FMU, <b>it must be justified and:</b></p> <ul style="list-style-type: none"> <li>-Complies with national land use and forest management policies and regulations and comply with the management plan;</li> <li>-does not destroy forests with a significantly high carbon stock;</li> <li>-cannot exceed 5% of the production series area;</li> <li>-Cannot be located in conservation series.</li> <li>- <b>Does not have negative impact on EIFA, culturally and socially significant areas, or other protected areas</b></li> <li>-Contributes to long-term conservation, economic and social benefits</li> <li>- <b>Includes consultation with affected stakeholders.</b></li> </ul>

8.1.4	PEFC requirement	8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: e) makes a contribution to long-term conservation, economic, and social benefits.
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PAFC Standard & Documentation	7.3.6 In the event of a forest conversion within the FMU, (...) The conversion must also: - Contribute to enhance ecologically, socially or culturally important forest areas and/or other protected areas on the long term; - Contribute to the long term preservation of socio-economic benefits.
Assessor's minor non-conformity	It is insufficiently ensured that the conversion will contribute to conservation, as: - The wording “or” and “and/or” in the first clause does insufficiently ensure a contribution to conservation. For instance, it allows for contribution to socially important forest areas only. - The second clause only refers to the preservation of socio-economic benefits.
Response submitted	<b>Rewriting of requirement 7.3.6</b> 7.3.6 In the event of a forest conversion within the FMU, <b>it must be justified and:</b> -Complies with national land use and forest management policies and regulations and comply with the management plan; -does not destroy forests with a significantly high carbon stock; -cannot exceed 5% of the production series area; -Cannot be located in conservation series. - <b>Does not have negative impact on EIFA, culturally and socially significant areas, or other protected areas</b> - <b>Contributes to long-term conservation, economic and social benefits</b> - <b>Includes consultation with affected stakeholders.</b>

8.1.5	PEFC requirement	8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion: 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;
	PAFC Standard & Documentation	7.3.7 In the case of forest plantations established on non-forest ecosystems, (...) Plantations must: - Make a positive contribution to threatened (vulnerable, rare, endangered) non-forest ecosystems, areas of important social and cultural interest, significant habitats of threatened species and/or other protected areas;
	Assessor's minor non-conformity	It is insufficiently ensured that conversion shall not have negative impacts on the specific areas, the more as the wording “or” in the clause leaves the option open to have a positive contribution to one forest type, while having negative impact on the other.
	Response submitted	<b>Amendment of requirement 7.3.7</b> <b>(...) Have no negative impact on</b> threatened (vulnerable, rare, endangered) non-forest ecosystems, areas of important social and cultural interest, significant habitats of threatened species <b>and/or</b> other protected areas

8.1.5	PEFC requirement	8.1.5 The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion: f) makes a contribution to long-term conservation, economic, and social benefits.
	PAFC Standard & Documentation	7.3.7 In the case of forest plantations established on non-forest ecosystems, (...) Plantations must: - Make a positive contribution to threatened (vulnerable, rare, endangered) non-forest ecosystems, areas of important social and cultural interest, significant habitats of threatened species and/or other protected areas; - Contribute to the preservation of socio-economic benefits over the long term."
	Assessor's minor non-conformity	It is insufficiently ensured that conversion shall not have negative impacts on the specific areas, the more as the wording "or" in the clause leaves the option open to have a positive contribution to one forest type, while having negative impact on the other.
	Response submitted	<b>Amendment of requirement 7.3.7</b> (...) <b>Have no negative impact on</b> threatened (vulnerable, rare, endangered) non-forest ecosystems, areas of important social and cultural interest, significant habitats of threatened species <del>and/or</del> other protected areas -Contribute to the preservation of <b>economic and social benefits</b> over the long term.
8.1.6	PEFC requirement	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: h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.
	Assessor's comment	The wording "damaged, non-regenerable proven forests" in clause 7.3.8 is a bit vague, as it is expected it should read as "proven damaged and proven non-regenerable forests"
	Response submitted	<b>Requirement amended</b> 7.3.8 <b>The conversion of proven degraded and non-regenerable forests</b> into forest plantations by the organisation can only take place if the conversion:
8.2.6	PEFC requirement	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.
	PAFC Standard & Documentation	7.2.13 In the case of a degraded forest, the organisation must take measures to maintain or improve the stability of the forest by - encouraging afforestation, reforestation and other planting activities. - promoting pest control operations, silvicultural alternatives and biological measures to minimise the use of pesticides



Assessor's minor non-conformity	For relatively intact natural forests in the Congo Basin, the pest management could be considered an integral part of the functioning ecosystem. However, this is not ensured for planted forests on non-forest land, as clause 7.2.13 specifically relates to afforestation / reforestation of degraded forest. It is not ensured that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred in planted forests.
Response submitted	<p><b>Amendment of requirement 7.1.9 about plantations and annex 2 referring to requirement 7.2.3 about the general use of pesticides</b></p> <p><b>7.1.7</b> When planting trees, the organisation must comply with the national laws that are in effect and favour local species that are adapted to the conditions of the site. If introduced species, provenances or varieties are used, only those whose impacts on the ecosystem and genetic integrity of the forest have been scientifically assessed may be used, if these negative impacts can be avoided or minimised. <b>IMP and any silviculture actions on these areas must minimize the use of pesticides by all possible means.</b></p> <p><b>Use of chemical products (requirement 7.2.3)</b></p> <p><b>The organization must minimize the use of pesticides by all possible means such as IPM, alternative silviculture actions or biological control. In all cases,</b> the organisation must prohibit the use of pesticides containing Persistent Organic Pollutants (POPs) listed by the Stockholm Convention.</p> <p>The organisation must prohibit the use of Type 1A and 1B (WHO classification) pesticides and other highly toxic pesticides identified in legal and regulatory texts, unless no viable alternatives are available. In the event of force majeure, and in the absence of any other technical alternative and on the basis of a detailed justification, these products may be used after the Certification Body has been informed.</p> <p>A procedure in accordance with these requirements must be developed and followed.</p> <p>Monitoring of the quantities used and the sites where the products have been used must be implemented.</p> <p><del>When fertilizers are used by the organisation</del> <b>Fertilizers are not to be used as an alternative to appropriate soil management and,</b> they must be applied in a controlled manner so as to minimise environmental impacts.</p>

8.2.2	PEFC requirement	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.
	PAFC Standard & Documentation	Requirement on diversity not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark

Response submitted	<b>New requirement in 7.1.1</b> <b>7.1.1 The organization's forest management and harvesting practices shall contribute to the maintenance, conservation or enhancement of the natural character of FMU's forests and the existing biodiversity on landscape, ecosystem, species and genetics levels (3).</b> <b>(3) To the extent that current scientific knowledge of the genetic diversity of the tropical forests of the Congo Basin allows, which remains partial given the very great diversity of this ecosystem</b>
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8.2.11	PEFC requirement	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.
	PAFC Standard & Documentation	Requirement on fertilizers not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
	Response submitted	<b>Amendment of requirement 7.2.3 annex</b> <del>When fertilizers are used by the organisation</del> <b>Fertilizers are not to be used as an alternative to appropriate soil management and, they</b> must be applied in a controlled manner so as to minimise environmental impacts.

8.4.1	PEFC requirement	8.4.1 The standard requires that management planning shall aim to maintain, conserve or enhance biodiversity on landscape, ecosystem, species and genetic levels.
	PAFC Standard & Documentation	A new requirement was added to the original version 6.1.x Management planning shall aim to maintain, conserve or enhance diversity and biodiversity on landscape, ecosystem, species. In addition, an annex to the standard presented the requirements of the benchmark that had been deemed inappropriate for the specific context of the Congo Basin forests. In this annex, the "genetic" dimension was specifically pointed out as not being appropriate given the state of scientific knowledge.
	Assessor's minor non-conformity	It is insufficiently ensured that forest management planning shall aim to maintain, conserve or enhance biodiversity on genetic levels.
	Response submitted	<b>New requirement at the beginiing of paragraph 7.1</b> <b>7.1.1 The organization's forest management and harvesting practices shall contribute to the maintenance, conservation or enhancement of the natural character of FMU's forests and the existing biodiversity on landscape, ecosystem, species and genetics levels(3) .</b> <b>(3) To the extent that current scientific knowledge of the genetic diversity of the tropical forests of the Congo Basin allows, which remains partial given the very great diversity of this ecosystem</b>

8.4.5	PEFC requirement	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.
	PAFC Standard & Documentation	Requirement on genetic diversity not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
	Response submitted	<b>Requirement amended</b> 7.1.9 When planting trees, the organisation must comply with the national laws that are in effect and favour local species that are adapted to the conditions of the site. If introduced species, provenances or varieties are used, only those whose impacts on the ecosystem <b>and genetic(5) integrity of the forest</b> have been scientifically assessed may be used, if these negative impacts can be avoided or minimised. IMP and any silviculture actions on these areas must minimize the use of pesticides by all possible means. (5) To the extent that current scientific knowledge of the genetic diversity of the tropical forests of the Congo Basin allows, which remains partial given the very great diversity of this ecosystem

8.4.6	PEFC requirement	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
	PAFC Standard & Documentation	Requirement not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
	Response submitted	<b>New requirement at the end of paragraph 7.1</b> <b>7.1.11 To the extent that the connectivity of forest ecosystems within a FMU is degraded, afforestation or reforestation measures should be promoted by the organization.</b>

8.4.8	PEFC requirement	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.
	PAFC Standard & Documentation	Requirement not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark

Response submitted	<b>New requirement in 7.1.1</b> <b>7.1.1 The organization's forest management and harvesting practices shall contribute to the maintenance, conservation or enhancement of the natural character of FMU's forests and the existing biodiversity on landscape, ecosystem, species and genetics levels (3).</b> (3) To the extent that current scientific knowledge of the genetic diversity of the tropical forests of the Congo Basin allows, which remains partial given the very great diversity of this ecosystem
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8.4.9	PEFC requirement	8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.
	PAFC Standard & Documentation	Requirement not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
	Response submitted	<b>New requirement at the end of paragraph 7.1</b> <b>7.1.11 To the extent that the connectivity of forest ecosystems within a FMU is degraded, afforestation or reforestation measures should be promoted by the organization.</b>

8.4.11	PEFC requirement	8.4.11 The standard requires that infrastructure shall be planned and constructed in a way that minimises damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species – in particular their migration patterns – into consideration.
	PAFC Standard & Documentation	Requirement on genetic reserves not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
	Response submitted	Requirement amended 7.1.4 The planning and implementation of infrastructure must be carried out in such a way as to minimise damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves(2), and to take threatened or other key species – in particular their migration patterns – into consideration. (2) To the extent that current scientific knowledge of the genetic diversity of the tropical forests of the Congo Basin allows, which remains partial given the very great diversity of this ecosystem

8.4.12	PEFC requirement	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.
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PAFC Standard & Documentation	Requirement not considered relevant in the Congo Basin context and not included in the standard
PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
Response submitted	<b>New requirement at the end of paragraph 8.1</b> <b>8.1.9 Traditional management practices that create valuable ecosystems on appropriate sites should be supported where appropriate.</b>

8.4.13	PEFC requirement	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.
	PAFC Standard & Documentation	Requirement not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
	Response submitted	<b>New requirement in 7.1.1</b> <b>7.1.1 The organization's forest management and harvesting practices shall contribute to the maintenance, conservation or enhancement of the natural character of FMU's forests and the existing biodiversity on landscape, ecosystem, species and genetics levels (3).</b> <b>(3) To the extent that current scientific knowledge of the genetic diversity of the tropical forests of the Congo Basin allows, which remains partial given the very great diversity of this ecosystem</b>

8.6.2	PEFC requirement	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.
	PAFC Standard & Documentation	Requirement not considered relevant in the Congo Basin context and not included in the standard
	PEFC's comment	It is not possible to exclude any requirement from the benchmark, all must be included in some way in the regional benchmark
	Response submitted	<b>New requirement at the end of paragraph 7.2</b> <b>7.2.13 If the applicable national laws and regulations allows it and the organization contributes to the development of the recreational functions of forests, public access to forests should be organized taking into account the effects on the ecosystem and resources, as well as safety rules and respect for existing uses.</b>

## **Certification and Accreditation Procedures**

no comments