

August 2022

PEFC Conformity Assessment

German PEFC Scheme



Client

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Document version	4
Date of document	August 2022
Reference	PEFC CA PEFC Germany_RW



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Acronyms

CAR	Corrective Action Request
CB	Certifying Body
CoC	Chain of Custody
IAF	International Accreditation Working Group
ILO	International Labour Organization
N.A.	Not applicable
NGO	Non-governmental organization
NGB	National Governing Body
PEFC GD	Guidance Document of PEFC International
PEFC IGD	PEFC Informative Guide
PEFC ST	Standard Document of PEFC International
PEFC	Programme for the Endorsement of Forest Certification
PEFCC TD	PEFC Council Technical Document
Req.	Requirement
SFM	Sustainable Forest Management



1. Introduction

The Programme for Endorsement of Forest Certification schemes (PEFC) admits national schemes for Sustainable Forest Management to the PEFC system, after the national schemes are endorsed based on a positive evaluation by an independent Assessor. Every five years, the endorsed national schemes need to be revised after which an independent Assessor assesses whether the revised scheme is in conformity with the PEFC Council's standard and system requirements.

This report presents the results of the evaluation of the German forest certification scheme (also and hereafter referred to as: German PEFC Scheme) against PEFC Council requirements for forest certification schemes. The application for PEFC endorsement was submitted in March 2021.

PEFC Council appointed Form International as the independent Assessor to carry out the conformity assessment. This assessment report will be the basis for the decision of the PEFC Council and provides a recommendation to the PEFC Board on the formal endorsement of the German PEFC Scheme for Sustainable Forest Management (SFM).

1.1. Form International

The assessment benefited from Form International's specific experience and expertise in certification and SFM. Form International has implemented many studies in which national or international certification standards were assessed against another standard or scheme, for example for the Forest Stewardship Council and Keurhout. Moreover, Form International has carried out conformity assessments for PEFC, such as the Certification Schemes of Australia, Austria, Belgium, Congo Basin, Czech Republic, Denmark, Finland, Gabon, Germany, Hungary, Indonesia, Ireland, Malaysia, Norway, Poland, Portugal, Romania, Spain, Sweden, Switzerland, Thailand, UK, Uruguay, USA and Canada.

The conformity assessment team consisted of Mr. Rutger de Wolf, Ms. Esther Boer and Ms. Ronja Knippers (Forestry Experts and Registered PEFC Assessors) and is referred to as the Assessor in this report.

1.2. Scope of the assessment

The scope and process of the assessment follow the assessment of a new system, as elaborated in PEFC GD 1007:2017 chapter 6.3.1, which means a "full assessment". The conformity of the German PEFC Scheme is assessed against the PEFC standards and system requirements as presented in PEFC IGD 1007:2017.



1.3. Documents and resources used

Various documents and resources were used in this conformity assessment. The documents received from PEFC Germany are shown in Table 1.1. Table 1.2 lists the documents used from PEFC Council. Besides these documents, the website used by PEFC Germany was consulted during the assessment.

Table 1.1 Documents used for the conformity assessment

Number	Title
PEFC D 0001:2020	The German forest certification scheme - System description
PEFC D 1001:2020 V3	Regional forest management certification – Requirements (English version as received in December 2021)
PEFC D 1002-1:2020 V2	PEFC standards for sustainable forest management (English version as received in December 2021)
PEFC D 1002-2:2017	PEFC standards for Christmas tree plantations on forest land
PEFC D 1002-3:2020	PEFC standards for spa/medicinal/recreational forest
PEFC D 1003-1:2015	Requirements for bodies providing audits for regional certification
PEFC D 1003-2:2017	Requirements for bodies providing audits for Christmas tree plantations on forest land
PEFC D 1003-3:2020	Requirements for bodies providing audits for spa/medicinal/recreational forest
PEFC D 1004:2014	PEFC Regional logo usage rules – Requirements
PEFC D 2002-1:2014	Chain of custody of forest-based products – Specifications for PEFC Regional Label
PEFC D 3004:2016	Guidance for the development and implementation of internal monitoring programmes
PEFC D 4001:2019 Version 2	Standard revision procedures (English version as received in May 2022)
PEFC D 4002:2010	Statutes of PEFC Germany e.V.
PEFC D 4003:2018	Scale of fees
PEFC D 4004:2020	Procedures and criteria for the endorsement of forest service enterprise certificates
PEFC D 4005:2014 V2	Dispute settlement procedures (English version as received in December 2021)
PEFC D 4006:2014	Issuance of licenses for PEFC logo usage and for [PEFC D] label usage
PEFC D 4007:2015	PEFC Notification of certification bodies
(none)	Standard Revision Report
(none)	PEFC Checklists for <ul style="list-style-type: none"> • Standard Setting Procedures and Process; • Sustainable Forest Management; • Group Forest Management Certification; • Scheme Administration; • Certification and Accreditation Procedures.
(none)	About 60 documents providing evidence of the standard setting process



Table 1.2 The PEFC Council Technical documents used.

#	PEFC Council document	Date
1	PEFC GD 1007:2017 Endorsement and Mutual Recognition of National Systems and their Revision	1 November 2017
2	PEFCC TD Annex 1: Terms and Definitions	27 October 2006
3	PEFCC TD Annex 6: Certification and Accreditation Procedures	5 October 2007
4	PEFCC TD Annex 7: Endorsement and Mutual Recognition of National Schemes and their Revisions	5 October 2007
5	PEFC ST 1001:2017 Standard-setting – Requirements	15 November 2017
6	PEFC ST 1002:2018 Group Forest Management – Requirements	28 November 2018
7	PEFC ST 1003:2018 Sustainable Forest Management – Requirements	28 November 2018
8	PEFC ST 2001:2020 PEFC Trademarks Rules - Requirements	14 February 2020
9	PEFC ST 2002:2020 Chain of Custody of Forest and Tree Based Products - Requirements	14 February 2020
10	PEFC ST 2003:2020 Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard	14 February 2020
11	PEFC GD 1005:2020 Issuance of PEFC trademarks usage licences by the PEFC Council	12 February 2020
12	PEFC Checklist – Standard-setting Procedures and process	30 November 2019
13	PEFC Checklist – Group Forest Management Certification	30 November 2019
14	PEFC Checklist – Sustainable Forest Management	30 November 2019
15	PEFC Checklist – Certification and Accreditation Procedures (Annex 6)	30 November 2019
16	PEFC Secretariat's clarification concerning the content of the assessment report (clarification 30/10/12).	30 October 2012

1.4. Methodology adopted

The work consisted of a desk study in which an evaluation of the conformity was conducted. The assessment enabled the Assessor to identify any missing information, similarities and differences between the German PEFC Scheme and the PEFC Council's standards and system requirements. Next to a general analysis of the structure of the system, the assessment consisted of:

1. Assessment of the Standard-setting Procedures and process

This aspect is evaluated on the basis of PEFC ST 1001:2017 Standard-setting - Requirements. The PEFC Checklist has been used to assess the compliance of the German PEFC Scheme with the requirements of PEFC concerning the Standard-setting Procedures and the actual process. The criteria for the Standard-setting Procedure have been assessed in two stages:

1. compliance of the scheme documented procedures ('Procedures')
2. compliance of the standard-setting process itself with the procedures ('Process')



To assess the standard-setting process, the standard revision report, explanations from PEFC Germany, additional evidential records and results of stakeholder consultations are used to evaluate compliance of the standard-setting process.

The PEFC Council conducted an international public consultation on the scheme, and a stakeholder survey was organized by Form International through questionnaires that were sent out to members of the Working Group and other relevant stakeholders identified by PEFC Germany during the standard-setting process.

2. Assessment of the Sustainable Forest Management standard

The compliance of the German PEFC Scheme with PEFC ST 1003:2018 Sustainable Forest Management – Requirements (including Appendix 1 and Appendix 2) was assessed based on the PEFC Checklist.

3. Assessment of the Chain of Custody standard

The compliance of the German PEFC Scheme with PEFC ST 2002:2020 – Chain of Custody of Forest and Tree Based Products - Requirements was assessed based on the PEFC Checklist.

4. Assessment of the Group Certification model

The compliance of the German PEFC Scheme with PEFC ST 1002:2010, Group Forest Management Certification – Requirements was assessed based on the PEFC Checklist.

5. Assessment of the Certification and Accreditation Procedures

The compliance of the German PEFC Scheme with PEFC TD Annex 6 (Certification and accreditation procedures) and PEFC ST 2003:2020 was assessed based on the PEFC Checklist.

6. Other aspects regarding functions and efficiency of the scheme

The functions and efficiency of the German PEFC Scheme were evaluated on the basis of descriptions and information obtained in correspondence with PEFC Germany and stakeholders.

The report is written in line with the guidelines of the PEFC Council, PEFC GD 1007:2017 Appendix 2 for the content of an assessment report, and the additional PEFC Secretariat's clarification of 30 October 2012.

1.5. Assessment process

The conformity assessment process consisted of the following steps:

1. Public consultation

The international public consultation was held from 21 April to 18 June 2021. No comments were received (Annex 3).

The national stakeholder survey was held from 28 July to 11 August 2021. Form International sent out questionnaires to all stakeholders that were members of the Working Group and a selection of additional stakeholders that were invited and/or participated in public consultation meetings during the revision process. In total 158 questionnaires were sent out, 17 responses were received.

2. Technical desk study

The technical desk study was carried out on the German PEFC Scheme documentation. It comprised of a review of the documentation and a verification of the elaborated PEFC Checklist. During the assessment additional information was requested from PEFC Germany.

3. Elaboration of draft report

The draft report was sent to PEFC Germany and PEFC Council Secretariat on 8 September 2021.

4. Commenting period

Based on the draft report, it was concluded to provide PEFC Germany an extension period (due to a large number of issues found). PEFC Germany provided responses additional references, information and clarifications to the draft report in December 2021 and in June 2022.

5. Elaboration of final draft report

Based on the responses and additional references and clarifications to the draft report, a final draft report was developed and was sent to PEFC Council Secretariat on 1 July 2022.

6. Internal review of the final draft report

The PEFC Council Secretariat conducted an internal review and contributed to the final report by providing Form International with their feedback and comments.

7. Final analysis and reporting

Based on the feedback and comments from PEFC Council Secretariat's internal review, a final report was developed and was sent to the PEFC Council Secretariat on 11 August 2022.

A timetable of the assessment process is presented below.

Week	1	2	3	4*	5	6	7	8	9	10	11	12	13	14	15
1a. International public consultation	**														
1b. Stakeholder survey															
2. Technical desk study															



3. Elaboration of draft report															
4. Commenting period PEFC Germany															
6. Elaboration of final draft report															
7. Internal review															
8. Elaboration final report															

* This period included an additional three weeks break, due to holiday season.

** Already finished at the start of the Assessor's assessment process.

1.6. Report structure

The structure of the report follows the guidance of PEFC GD 1007:2017:

Chapter 2	Explicit statement in the form of a recommendation on whether the Board of Directors of PEFC should endorse the German PEFC Scheme.
Chapter 3	Summary of the findings.
Chapter 4	Overview of the key structures of the scheme.
Chapter 5	Standard-setting Procedures – assessment results.
Chapter 6	Standard-setting process – assessment results.
Chapter 7	Forest management standard – assessment results.
Chapter 8	Group certification requirements – assessment results.
Chapter 9	Chain of Custody standard – assessment results.
Chapter 10	Certification and accreditation procedures – assessment results.
Chapter 11	Other aspects related to the System.

The PEFC Checklists are enclosed in Annex 1. Results of the stakeholder survey and international consultation are presented in respectively Annex 2 and Annex 3. Feedback and comments of the internal review are presented in Annex 4.



2. Recommendation

Based on the results of this conformity assessment, Form International recommends the PEFC Board of Directors **to maintain the endorsement of the German PEFC Scheme**, on the condition that the remaining nine (9) nonconformities in the scheme documentation shall be corrected within six (6) months after endorsement:

- Five (5) nonconformities in the Standard-setting Procedures;
- One (1) in the Group Certification Requirements;
- One (1) in the Forest Management Standard;
- Two (2) in the Certification and Accreditation Procedures.

All nonconformities are classified as minor.

In relation to the standard-setting process, four (4) nonconformities are found. Based on the assessment, it is concluded that the nonconformities found in the standard-setting process did not undermine or damage the standard-setting process.

It shall be noted that the German PEFC Scheme also includes standards for Christmas tree plantations (PEFC D 1002-2:2020) and for spa/medicinal/recreational forest (PEFC D 1002-3:2020). But these standards were not further assessed in this conformity assessment. As a consequence, they shall not be covered by any endorsement of the Scheme.

Therefore, the Assessor recommends PEFC Germany to clearly identify which elements of the scheme will then be endorsement by PEFC Council, and which elements can be applied without endorsement.



3. Summary of the Findings

3.1. Overall

The German PEFC Scheme is in general quite complete and clear. However, there were five (5) nonconformities found in the Standard-setting Procedures, four (4) in the standard-setting process, one (1) in the Forest Management Standard, one (1) in the Group Certification Requirements, and two (2) in the Certification and Accreditation Procedures. This is in total thirteen (13) nonconformities, all classified as minor.

3.2. Structure of the System

PEFC Germany joined PEFC in 1999 and their system was first endorsed in 2000. After that the system was re-endorsed in 2005, 2010 and 2016. PEFC Germany is a registered association of a variety of stakeholders. The association has three executive bodies: 1) the Board; 2) the German Forest Certification Council (GFCC); and 3) the General Assembly. The board is responsible for calling meetings of the General Assembly, GFCC and working group; for calculating general budgets and electing members of the GFCC. The GFCC develops, governs and administers the German PEFC scheme and is, amongst others, responsible for deciding on the certification criteria and indicators for sustainable forest management, as well as appointing working groups and a dispute settlement body and calling its members. The General Assembly of PEFC Germany members is called upon at least once a year and has decision making responsibility when the GFCC is not in charge.

All forest management certification in Germany is organised under regional group certification where the regional PEFC working group applies for forest management certification at a certification body. It is usually formed on state (Bundesland) level.

3.3. Standard-setting Procedures

The Standard-setting Procedures are regulated in PEFC D 4001:2019. It is a clearly structured document. There are however five (5) non-conformities found, relating to:

1. Records to be available upon request (req. 5.2.3);
2. Access to proposal for the standard in the announcement and invitation (req. 6.3.1b);
3. Review of standard-setting process based on comments received (req. 6.3.2);
4. Identification and contact information on standard (req. 7.2.2a);
5. Printed copies to be made available upon request (req. 7.2.3);

3.4. Standard-setting process

The standard-setting process went relatively well, however, four (4) non-conformities are found:

1. Reference to procedures in the announcement (req. 6.3.1f);
2. English version as reference in case of inconsistency (req. 7.2.2c);



3. Next revision date on the standard (req. 7.2.2d);
4. Permanent mechanism for collecting and recording feedback (8.2.1);

Based on the assessment it is concluded that the nonconformities found in the standard-setting process did not undermine or damage the review process. It would therefore not be adequate to redo the standard-setting process based on the nonconformities found in the process.

3.5. Forest Management Standard

The Sustainable Forest Management requirements are stipulated in PEFC D 1002-1:2020 (and partially in PEFC D 1001:2020). The standard is structured in different chapters, containing the specific forest management requirements, and includes eight guidances in the annexes (partially normative) with further guidance on specific forestry issues. The standard is in general quite well elaborated, however, one (1) non-conformity is found in the Forest Management Standard, relating to:

1. Conversion of a small proportion of forest type within the certified area (req. 8.1.4b);

The German PEFC Scheme also developed and operates a forest management standard for Christmas tree plantations (PEFC D 1002-2:2020), which is however not assessed in this conformity assessment. Additionally, a standard is developed for spa/medicinal/recreational forest (PEFC D 1002-3:2020), which includes the certification of specific forest ecosystem services. This standard requires full certification against PEFC D 1002-1:2020 and is therefore on top of PEFC D 1002-1:2020. However, the standard is not assessed in this conformity assessment.

3.6. Group Certification Requirements

The Group Certification Requirements are regulated in PEFC D 1001:2020. It is a clearly structured document. There is however one (1) nonconformity found, relating to:

1. Conditions constituting risk for each indicator for sampling (req. 9.3.3.2);

3.7. Chain of Custody Standard

German PEFC Scheme adopts the PEFC ST 2002:2020. The standard complies with the PEFC Council requirements, no nonconformities are found.

3.8. Certification and Accreditation Procedures

The requirements for certification and accreditation are regulated in PEFC D 1003-1:2015, PEFC D 1003-2:2017, PEFC D 1003-3:2020 and PEFC D 4007:2015, and include references to ISO 17021, and ISO 19011. PEFC ST 2003:2020 is furthermore adopted. There are however two (2) nonconformities found, relating to:

1. Controls of PEFC logo usage insufficiently ensured (req. 12);



2. Maximum surveillance audit potentially exceeds one year (req. 13).

3.9. Other aspects

With regards to Scheme Administration Procedures, the following procedures are found:

- Notification of Certification Procedures (PEFC D 4007:2015);
- Logo Usage Rules (PEFC D 1004:2014, PEFC D 2002-1:2014, PEFC D 4006:2014, and PEFC ST 2001:2020);
- Complaints and Dispute Resolution Procedures (PEFC D 4005:2014).

These are not further assessed in detail, in accordance with the tender document for this assignment. Further assessment of these procedures is conducted by the Technical Unit of PEFC Council.



4. Structure of the German PEFC Scheme

4.1. Introduction to the forestry sector in Germany

Germany has 11.4 million hectares of forest, 32% of the country's surface, which varies among the different states (see image below). The German forests have the highest growing stock in Europe after Russia, and are expanding with an average annual increment of 10.9 m³/ha (between 2012-2017). The most common tree species are spruce (25%), pine (22%), beech (15%) and oak (10%). Of the German forests about 8.7 million ha (76%) is under PEFC certification and 1.35 million ha (13%) is managed under FSC. PEFC Germany is the largest independent institution in Germany for forest certification.

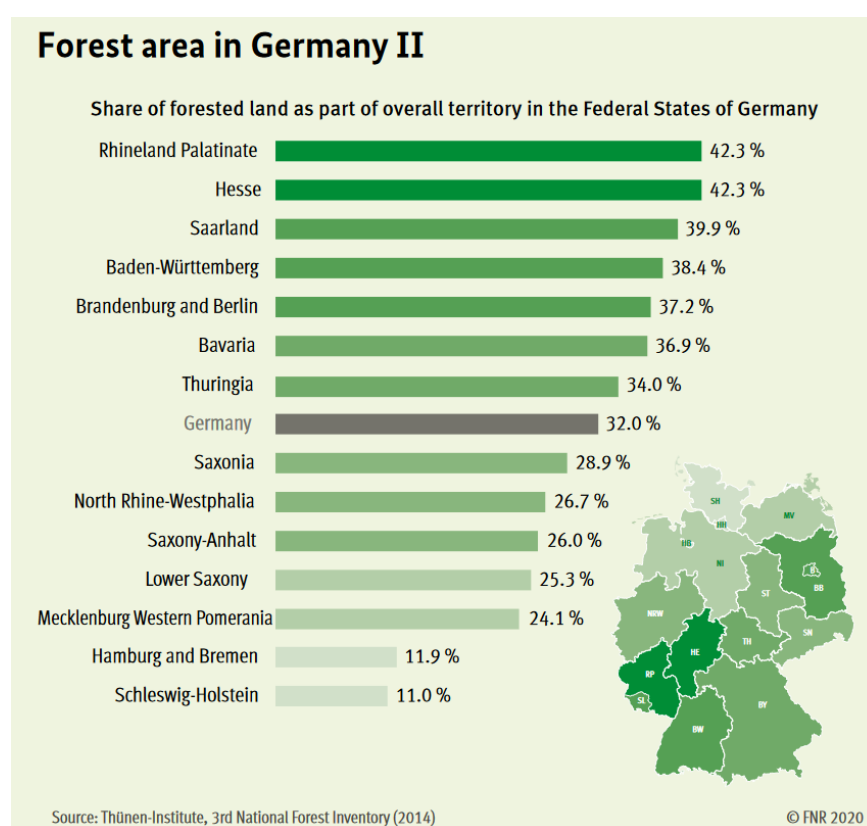


Figure 1: Share of forest land in the federal states of Germany

Forest management and ownership

Germany is a federation with a division in power between the federal government and the federal states. The Federal Ministry of Food and Agriculture is responsible for forest policy on the federal level and sets out the framework conditions for forests, forestry operations and the timber industry. The federal states are responsible for forest management and nature conservation in line with this general framework.

According to the latest National Forest Inventory of 2012, Forest ownership in Germany is 48% private owned, 29% state owned, 19% owned by cities and municipalities (communal), and 4% government owned. Private ownership is by far



the most common and many forests have been in the ownership of individuals of private entities for generations. There are an estimated 2 million communal and private forest owners in Germany. About half of the private forest area concerns plots of less than 20 ha, and only 13% of private forests are plots of more than 1,000 ha. Because of the high number of private forest owners with small plots, the average size of private forest ownership is only 2.5 ha. As a result of this, forestry cooperatives play an important role in forest management in Germany. There are an estimated 3,500 forestry cooperatives with about 430,000 members. This is also why group certification is one of the main features of the German PEFC scheme.

Functions of the German forests

The German forests have several functions. The forestry / timber sector is one of the main sectors for the Germany economy which employs an estimated 750,000 people, includes over 100,000 companies, and has an annual turnover of about € 130 billion. Its forests are important to meet domestic needs as well as for export. In the last years, Germany's roundwood production has amounted to over € 3.5 billion/year, which is processed into end products for the construction sector, furniture, packaging and paper. In terms of value, Germany is the third largest exporter of wood and wood products, after China and the United States of America.

Part of the German forests are also under a special protection status as they fulfil landscape, social or other ecological functions. Other uses of the forests include its use for non-timber forest products, like hunting, fishing, cuttings for ornamental uses, Christmas trees and commercial use of mushrooms and forest fruits.¹

4.2. Organisation of PEFC Germany

PEFC Germany is a registered association of a variety of stakeholders. It was founded in 1999 and administers the PEFC scheme. The association has three executive bodies: 1) the Board; 2) the German Forest Certification Council (GFCC); and 3) the General Assembly. The board is responsible for calling meetings of the General Assembly, GFCC and working group; for calculating general budgets and electing members of the GFCC. The GFCC develops, governs and administers the German PEFC scheme and is, amongst others, responsible for deciding on the certification criteria and indicators for sustainable forest management, as well as appointing working groups and a dispute settlement body and calling its members. The General Assembly of PEFC Germany members is called upon at least once a year and has decision making responsibility when the GFCC is not in charge.

The institutional arrangement of PEFC Germany consists of three main institutions. PEFC Germany, which is responsible for standard setting and the administration of the German PEFC system. Certification Bodies, which are independent institutions

¹ Information from: BMEL (2021) German Forest, Forest for nature and people <https://www.bmel.de/SharedDocs/Downloads/EN/Publications/german-forests.html>; www.fsc-deutschland.de; pefc.de.



that assess the client's conformity with the standards of the PEFC Germany scheme; and Accreditation Bodies, which for forest management certification is the Deutsche Akkreditierungsstelle (DakKS) in Germany, that provides assessments and surveillance of the certification bodies to ensure their impartiality and competence.

All forest management certification in Germany is organised under regional group certification where the regional PEFC working group applies for forest management certification at a certification body. It is usually formed on state (Bundesland) level. The working group is responsible for the implementation of the requirements for regional certification and represents the individual forest owners and forest unions taking part in the regional certification. It shall be noted that this is not applicable for certification against the standard for Christmas tree plantations and standard for spa / medicinal / recreational forests.

4.3. The German Forest Certification Scheme

PEFC Germany joined PEFC in 1999 and their system was first endorsed in 2000. After that the system was re-endorsed in 2005, 2010 and 2016. The PEFC Germany scheme consists of regional forest certification standard, and three separate forest management standards: 1) sustainable forest management; 2) Christmas tree plantations; and 3) spa-/medicinal-/recreational forests. The regional forest certification standard works in conjunction with the sustainable forest management standard. In addition to forest management certification, owners/managers of Christmas tree plantations or of spa-/medicinal-/recreational forest can apply for separate certifications of these two types of forest.

The PEFC Germany Scheme is based on a number of documents, which define the requirements for forest and traceability certification. The document structure is shown in the figure below.

Standards for operators	Standards for certifying bodies	Scheme governance
PEFC D 1001:2020 V3 Regional forest management certification – Requirements	PEFC D 1003-1:2015 Requirements for bodies providing audits for regional certification	PEFC D 0001:2020 System description
PEFC 3004:2017 Guidance for the development and implementation of internal monitoring programmes	PEFC D 1003-2:2017 Requirements for bodies providing audits for Christmas tree plantations on forest land	PEFC D 4001:2019 VERSION 2 Standard revision procedures
PEFC D 1002-1:2020 V2 PEFC standards for sustainable forest management	PEFC D 1003-3:020 Requirements for bodies providing audits for recreational forest	PEFC D 4002:2010 Statutes of PEFC Germany
		PEFC D 4003:2018 Scale of fees
		PEFC D 4004:2020



<p>PEFC D 1002-2:2017 PEFC standards for Christmas tree plantations on forest land</p> <p>PEFC D 1002-3:2020 PEFC standards for spa-/medicinal-/recreational forest</p> <p>PEFC D 2002-1:2014 Chain of custody of forest-based products – Specifications for [PEFC D] claims</p> <p>PEFC D 1004:2014 PEFC Regional logo usage rules – Requirements</p>	<p>PEFC ST 2003:2020 Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard</p> <p>PEFC D 4007:2015 PEFC Notification of certification bodies</p>	<p>Procedures and criteria for the endorsement of forest service enterprise certificates</p> <p>PEFC D 4005:2014 V2 Dispute resolution procedures</p> <p>PEFC D 4006:2014 Issuance of licenses for PEFC logo usage and for [PEFC D] label usage</p>
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5. Standard-setting Procedures

This chapter presents the findings of the assessment of the Standard-setting Procedures. There are five (5) nonconformities found, all classified as minor. They can all be addressed by adjusting the procedures. The PEFC Checklist related to the Standard-setting Procedures can be found in Annex 1 part I, which presents all the conformities, nonconformities and related references.

5.1. Analysis

The procedures for standard-setting are regulated in PEFC D 4001:2019. This is a clearly structured document. It defines requirements for normal revisions of standards, and does not include options for reaffirmation of standards, editorial revisions or time-critical revisions. One observation² is made:

- The reference in clause 4c still refers to the old title of the dispute settlement procedures.

Additionally, five (5) nonconformities were found, all classified as minor.

5.2. Results: Nonconformities

The nonconformities found in the Standard-setting Procedures are presented in the tables below.

Requirement	5.2.3 Documented information shall be available to interested parties upon request.
Evidence	PEFC D 4001:2019 Version 2 “7. Documentation To ensure transparency and public availability, all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany within 14 days after formal approval.”
Assessors’ comments	No reference is found in the procedures that all documented information listed under requirement 5.2.1 (other than drafts and final documents) shall be available to interested parties upon request.
Result	Does not conform - minor
CAR	Provide evidence to show conformity or update the procedures

Requirement	6.3.1 The announcement and invitation shall include: (b) access to the proposal for the standard (refer to 6.1),
Evidence	PEFC D 4001:2019 Version 2 “1. (...) The document shall be regularly revised and adapted at least every five years considering comments of interested parties. The document is publicly available.”

² Observations are weaknesses found in the Scheme, which are not considered to be a nonconformity.



	<p>3.1 Announcement</p> <p>(...) This communication shall inform about the objectives, the scope, the schedule and the opportunities for participation. The procedures of the standard revision shall also be referred to”</p>
Assessors' comments	<p>For a revision, the proposal must include the scope (which is the standard to be revised) and the stages and timelines, which is covered in clause 3.1.</p> <p>However, for the development of a new standard, no reference is found that the announcement and invitation shall include access to the proposal for the standard. It shall be noted that no new standard was developed during this revision process, which makes the missing element not an issue for the current process. It however remains a gap in the procedures for future standard-setting processes, where new standards (e.g. TOF) might be developed.</p>
Result	Does not conform - minor
CAR	Provide evidence to show conformity or update the procedures

Requirement	6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.
Evidence	<p>PEFC D 4001:2019 Version 2</p> <p>“2.2 (...) Between two standard revisions, the PEFC secretariat collects feedback on the standards via a corresponding website, which will be presented to the working groups at their first meeting.”</p>
Assessors' comments	<p>Clause 2.2 ensures that feedback on the standards is used in the process. However, no reference is found that the standardising body will review the proposed standard-setting process (as outlined in the announcement, such as proposed timelines and activities) based on the feedback received in response to the public announcement.</p>
Result	Does not conform - minor
CAR	Provide evidence to show conformity or update the procedures

Requirement	<p>7.2.2 Standard(s) shall include:</p> <p>(a) identification and contact information for the standardising body,</p>
Evidence	<p>Explanation provided by PEFC Germany</p> <p>“this is common practice since 20 years.”</p>
Assessors' comments	<p>No reference is found in the standard setting procedures that the standard shall include identification and contact information for the standardising body. Although this might go well in practice, it shall be regulated in the procedures.</p>
Result	Does not conform - minor
CAR	Provide evidence to show conformity or update the procedures

Requirement	7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any)
Evidence	<p>Explanation provided by PEFC Germany</p> <p>“The copies are publicly available (https://pefc.de/media/filer_public/cf/02/cf023700-11de-47e5-88e8-</p>



	224cd390070e/pefc-standards_grafikversion_online_stand082021.pdf) and can be printed for free. Printed copies are send out for free, too, upon request.”
Assessors' comments	No reference is found in the standard-setting procedures that printed copies shall be made available upon request at a price that covers no more than administrative costs. Although this might go well in practice, it shall be regulated in the procedures.
Result	Does not conform - minor
CAR	Provide evidence to show conformity or update the procedures



6. Standard-setting process

This chapter presents the findings of the assessment of the standard-setting process. There are four (4) nonconformities found, which are all classified as minor. In some cases they can be addressed by providing additional evidence. The PEFC Checklist related to the standard-setting process can be found in Annex 1 part I, which presents all the conformities, nonconformities and related references.

6.1. Analysis

The review process of the German PEFC Scheme was governed by three main institutions: 1) the German Forest Certification Council (GFCC); 2) a working group on the “Standard Revision” (WG, or AG in German); and 3) the PEFC Secretariat (SEC). The process of the standard revision consisted of 5 phases and was based on the procedures described in PEFC D 4001:2019, which was adopted by the GFCC on June 24, 2019. On June 25, 2019, the SEC held a dialogue forum as a kick-off event for the standard revision with 90 participants which had been invited in April and May 2019. The revision of the standard was announced by the SEC in August 2019 and 182 organisations relevant for the standard revision were invited to express their interest in joining the WG, and to send their suggestions on amendments to the PEFC standards.

The GFCC appointed the members of the WG in November and December 2019. The WG consisted of 62 members and had representation from the following stakeholders:

- Private forest representatives
- State forest representatives
- Communal forest representatives
- Wood, pulp and paper industry, including trade
- Environmental NGO's
- Unions
- Other forest representatives
- Other users
- Forest service
- Scientist

The WG assembled three times between December 2019 and July 2020, during which a first draft of the new standards was developed, partly in sub-working groups on specific topics. A draft of documents PEFC D 1001, PEFC D 1002-1, PEFC D 1002-3, PEFC D 1003-3 and PEFC D 4004 was presented by the SEC at the PEFC Conference in Berlin on 26 August 2020, after which the general public could comment during the online consultation period. In its fourth and final meeting the WG discussed 196 suggestions for amendments that were received in the preparation of the final drafts. Consensus on these drafts was reached and the documents were presented to the GFCC. The GFCC approved all revised documents on November



24, 2020, after which the new scheme documents were published on the website of PEFC Germany on December 1, 2020.

In general, the process was conducted according to the Standard-setting Procedures. The standard development report provides clear overview and details on the standard-setting process, including reference to evidential documents (hyperlinks). The standard-setting process went relatively well. Three observations³ are made:

- No minutes exist of the 4th WG meeting in which consensus was reached. Only references are found in the minutes of the GFCC Meeting to consensus reached on the standard in the fourth WG meeting (req. 5.2.1h and 6.4.5a).
- Nearly half of the stakeholders in the WG are forest owners, which is a relatively large group and risks to dominate the group. Also a few respondents in the stakeholder survey found that forest owners were overrepresented and environmental stakeholder and local communities underrepresented. However, the majority of respondents found that there was a balanced representation in the WG (req. 6.4.2a).
- For the public consultation (started on 26 August 2020), E-mails to stakeholders were sent but not until 4 September 2020, when the public consultation had already started. The public announcement was made at a conference and on the website at an earlier date (req. 6.5.1a).

Additionally, four (4) non-conformities are found in the standard-setting process, all classified as minor.

Based on the assessment it is concluded that the nonconformities found in the standard-setting process did not undermine or damage the standard-setting process. It would therefore not be adequate to redo the standard-setting process based on the nonconformities found in the process.

6.2. Results: Nonconformities

The nonconformities found in the standard-setting process are presented in the tables below.

Requirement	6.3.1 The announcement and invitation shall include: (f) access to the standard-setting procedures.
Evidence	(none)
Assessors' comments	The procedures were available on the website and included in the response form. However, the public announcement and invitation to stakeholders both do not provide direct access or reference to the standard-setting procedures.
Result	Does not conform - minor

³ Observations are weaknesses found in the Scheme, which are not considered to be a nonconformity.



Requirement	7.2.2 Standard(s) shall include: (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.
Evidence	PEFC D 4001:2019 Version 2 “All documents are written in German and translated into English for the purpose of recognition by the PEFC Council. In case of discrepancies between the German and English versions, the English version shall prevail.” PEFC D 1002-1:2020 V2 and PEFC D 1002-2:2020 “In case of any doubt the German version is decisive.”
Assessors' comments	The procedures (PEFC D 4001) comply with benchmark intention, however this is not reflected on the standards (PEFC D 1002-1:2020 V2 and PEFC D 1002-2:2020). The indication on the standards are in conflict with the procedures, it is therefore insufficiently ensured that the requirement is met.
Result	Does not conform - minor
CAR	Provide additional evidence

Requirement	7.2.2 Standard(s) shall include: (d) The approval date and the date of next periodic review
Evidence	PEFC D 1002-1:2020 V2 “Approved by: German Forest Certification Council Date: 24.11.2020”
Assessors' comments	On the approved version of the SFM standard no reference is found of the date of the next periodic review.
Result	Does not conform - minor
CAR	Provide additional evidence

Requirement	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 clear directions for providing feedback.
Evidence	(None)
Assessors' comments	The staff list of PEFC Germany is found on the website of PEFC Germany with field of expertise and contact details per person. However, no mechanism or description and clear directions are found for collecting and recording feedback on a standard.
Result	Does not conform - minor
CAR	Provide additional evidence



7. Forest Management Standard

This chapter presents the findings of the assessment of the Sustainable Forest Management Standard. One (1) nonconformity is found, classified as minor. A corrective action request is formulated. The PEFC Checklist related to the Sustainable Forest Management Standard can be found in Annex 1 part III, which presents all the conformities, nonconformity and related references.

7.1. Analysis

General forest management standard

The Sustainable Forest Management Certification requirements are stipulated in PEFC D 1002-1:2020 PEFC standards for sustainable forest management (part of the requirements for forest management are included in PEFC D 1001:2020 Regional forest management certification – Requirements). The standard is structured in different chapters, containing the specific forest management requirements. The chapters contain the following subjects:

0. Legal and other requirements
1. Forest resources
2. Health and vitality of forest ecosystems
3. Productive function of forests
4. Biological diversity in forest ecosystems
5. Protective functions of forests (regulating ecosystem services)
6. Socio-economic functions of forests

Eight guidances are added as annexes, which are partly normative:

- Guidance 1 on content of forest management plan
- Guidance 2 on plant protective agents
- Guidance 3 on soil protection
- Guidance 4 on trunk and crown usage
- Guidance 5 on biotope wood
- Guidance 6 on adapted game stocks
- Guidance 7 on qualified chain-saw training
- Guidance 8 on contracts with forest service enterprises

In general, PEFC D 1002-1:2020 and PEFC D 1001:2020 are clearly structured and auditable. Four observations⁴ are made:

- PEFC D 1002-1:2020 does not include definitions on specific terms;
- In a few cases, the wording of requirements in PEFC D 1002-1:2020 remains a bit general or vague, which might be difficult to audit, such as

⁴ Observations are weaknesses found in the Scheme, which are not considered to be a nonconformity.



- Herewith **special care** shall be put on the environmental interests. (Clause 3.5)
- **Special care** shall be given to riparian zones and the quality of ground and surface water in water protection areas. (Clause 5.2)
- Sites with acknowledged extraordinary historic, cultural or religious importance shall be managed with **special care**. (Clause 6.11)
- PEFC D 1002-1:2020 includes guidance chapters on specific matters. These are mostly written in the non-normative way (using words as 'should', 'could', 'may' and 'can'), and thus not auditable, whereas in a few cases it is written in a normative way, such as Guidance 1 on the content of a forest management plan (though confusingly the title of Guidance 1 is written as: "How **should** a management plan be designed?").
- PEFC D 1001:2020 Annex 1 contains a list of indicators and includes references to PEOLG and Vienna indicators. The PEOLG and Vienna indicators are however (largely) written in a non-normative way. It is unclear whether they are normative under the German PEFC Scheme, and leaves interpretation open to the implementers of the standard.

Additionally, one (1) non-conformity was identified, classified as minor.

Christmas tree plantations standard

PEFC Germany also developed a standard for Christmas tree plantations and ornamental brush-wood plantations (PEFC D 1002-2:2020). According to PEFC D 1001:2020 clause 1.3, forest certification in Germany is realized through group certification only (no individual certificates). Furthermore, individual forest owners cannot participate in a group certification with only their Christmas tree areas, as PEFC D 1001:2020 clause 1.3 explicitly states "It does not apply to forest areas that are managed exclusively for the production of Christmas trees and ornamental brush-wood." This means that only those Christmas tree plantation areas can be certified, where the forest owner has also additional forest land (non-Christmas tree). Furthermore, this also means that PEFC D 1001:2020 always also applies to Christmas tree plantations certified under PEFC D 1002-2.

It shall be noted that for this conformity assessment, the standard was not assessed.

Recreational, spa and medicinal standard

Additionally, PEFC Germany developed a standard for spa/medicinal/recreational forest (PEFC D 1002-3:2020). This standard is, according to its foreword "intended to offer the possibility of rewarding special services of the forest owner within the framework of PEFC certification. In addition to the production and marketing of certified timber, the demands on the forest, and thus on the forest owner, are increasing, especially in the areas of recreation and health. This standard takes this into account. The aim of certification is to demonstrate, also in the context of public presentation, that in certain parts of the forest the desire for recreation in the forest is taken into account through appropriate management. In addition, independent

auditors ensure that the positive effect of the forest on human health (spa and medicinal effect) plays a major role in the management of the forest certified according to this standard.”

It is noted that this standard only applies to forest owners who would like their forests to be certified against this standard. It is therefore not required for all forest owners who are certified against PEFC D 1002-1:2020 (but reversely, certification against PEFC D 1002-1:2020 is required to also get certified against PEFC D 1002-3:2020).

The PEFC benchmark system includes requirements for the certification of forests, (“PEFC certified forests”) and requirements for products harvested from these certified forests (e.g. “100% certified PEFC”). But no requirements are developed for the certification of specific services of forests, such as recreation, spa and/or medicinal services, except for general requirements regarding forest functions for society (such as requirements under 8.6). The intent of PEFC D 1002-3:2020 (certification of forests with claims on their specific functions – “PEFC certified recreational forest” or “PEFC certified spa forest” or “PEFC certified medicinal forest”; or corresponding combination of the three terms) could therefore not be assessed against benchmark requirements, PEFC International does not include certification for such services, it is beyond the scope of PEFC International’s benchmark standards.⁵ The standard is therefore not eligible for endorsement by PEFC.

Therefore, in this conformity assessment, the standard was not further assessed.

7.2. Results: Nonconformities

The nonconformity found in the Forest Management Standard is presented in the table below.

Requirement	8.1.4 The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion: b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and
Evidence	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation <p>1.3 Wood stemming from the conversion of forests (change of utilization) can only be declared „PEFC certified“, if the clearing is legally authorised according to nature conservation and forest law.”</p> <p>PEFC D 1001:2020 V3</p>

⁵ In fact, the German PEFC Scheme is expanding its scope to forest ecosystem services. The PEFC International scope however is limited to the certification of forests, and tracing the origin of (wood and tree) products harvested from the forest.



	<p>“7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that:</p> <p>(a) forest conversions do not affect more than 5% of the certified forest area in the region”</p>
Assessors' comments	It is insufficiently ensured that the conversion entails a small proportion of the forest type, as clause 7.1.1.3a (a) is referring to a small proportion of the (total) certified forest area.
Result	Does not conform – minor
CAR	Provide evidence to show conformity or update the standard



8. Group Certification Requirements

This chapter presents the findings of the assessment of the Group Certification Requirements. One (1) nonconformity is found, classified as minor and can be addressed by adjusting the procedures. The PEFC Checklist related to the Group Certification Requirements can be found in Annex 1 part II, which presents all the conformities, nonconformity and related references.

8.1. Analysis

The requirements for the Group Certification are regulated in PEFC D 1001:2020 Regional forest management certification - Requirements. As the German forest sector largely consists of small forest owners, the German PEFC Scheme only allows for group certificates, which means that each forest owner willing to get PEFC certified, must be(come) part of a Regional Working Group. These groups are defined by regions. The PEFC D 1001:2020 is a clearly structured document, however, one (1) nonconformity is found, classified as minor.

8.2. Results: Nonconformities

The nonconformity found in the group certification requirements is presented in the table below.

Requirement	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.								
Evidence	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>f) The sample shall be representative of the forest area of the participants.</p> <p>g) The sample shall be representative with regard to the spatial distribution of the forest areas as well as to the type of forest ownership (federal, state, communal, private forest).</p> <p>3. The random selection according to chapter 2. a) shall be proportional to the size of the forest area of the participants</p> <p>4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:</p> <table><tr><td>Risk</td><td>Low</td><td>High</td></tr><tr><td>Results of previous internal audits.</td><td>No nonconformities</td><td>Several nonconformities</td></tr></table>			Risk	Low	High	Results of previous internal audits.	No nonconformities	Several nonconformities
Risk	Low	High							
Results of previous internal audits.	No nonconformities	Several nonconformities							



	Quality / reliability of the internal monitoring programme, i.e. results of the risk analysis.	IMP reliable	IMP not reliable
	Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences
	Complaints received or relevant information from third parties.	None	Several
	Use of relevant information obtained through modern technologies (e.g. remote sensing).	Information utilized	Information not utilized
	Other measures taken to obtain relevant	Existent	Non-existent
39			
Assessors' comments	The risk analysis in clause 4 refers to changing the sample size (as required under 9.3.2.3) and does not directly define requirements for the determination of sample categories (as required under 9.3.3). Furthermore, the respective consequences for the sampling are not defined.		
Result	Does not conform – minor		
CAR	Provide evidence to show conformity or update the standard		



9. Chain of Custody

The Description of the German PEFC Scheme (PEFC D 0001:2020) provides further explanation on systems documentation. Clause 7.2.2.2 defines the applicable chain of custody standard:

“PEFC Germany has adopted, without any modification, the PEFC international chain of custody standard with the reference number PEFC D ST 2002:2020 as a part of the German PEFC scheme. PEFC Germany has developed additional requirements for the purposes of the own PEFC regional claim and label.”

The Chain of Custody Standard of the German PEFC Scheme does therefore comply with the PEFC Council requirements, no further assessment was carried out.



10. Certification and Accreditation Procedures

This chapter presents the findings of the assessment of the Certification and Accreditation Procedures. There are two (2) nonconformities found, which are all classified as minor. The PEFC Checklist related to the Certification and Accreditation Procedures can be found in Annex 1 part IV, which presents all conformities, nonconformities and related references.

10.1. Analysis

The requirements for accreditation and certification are regulated in:

- PEFC D 1003-1:2015 Requirements for bodies providing audits for regional certification
- PEFC D 1003-2:2017 Requirements for bodies providing audits for Christmas tree plantations on forest land
- PEFC D 1003-3:2020 Requirements for bodies providing audits for spa/ medicinal/ recreational forest
- PEFC D 4007:2015 PEFC Notification of certification bodies

PEFC D 0001:2020 provides the general system requirements, including requirements for Certification Bodies operating certification of the chain of custody: “7.2.2.6 The chain of custody certification for the purposes of using German PEFC regional claim and label is carried out against PEFC D ST 2003:2020 and PEFC D 2002-1.

7.2.2.8 The chain of custody certification is carried out by a certification body that is notified by PEFC Germany following ISO 17065 and PEFC D ST 2003:2012.”

Furthermore, Table 1 in PEFC D 0001:2020 provides the structure of the German PEFC scheme documentation, which also lists international standards “endorsed by PEFC Germany”, including the “Certification Body Requirements – Chain of Custody PEFC D ST 2003”. The website of the PEFC Germany provides a link to PEFC ST 2003:2020.

This sufficiently ensures that the requirements of PEFC ST 2003:2020 are met by the German PEFC Scheme. However, two observations are made:

- the addition of a “D” in the document name is confusing as PEFC Germany refers to the PEFC Benchmark standard, which does not contain a “D”;
- Clause 7.2.2.8 still refers to the 2012 version of PEFC ST 2003, whereas the newest version is from 2020.

The following steering documents are included as references for requirements for certification organizations:

- ISO/IEC 17011:2004 (Requirements for accreditation bodies accrediting conformity assessment bodies)



- ISO/IEC 17021:2015 (Requirements for certification bodies providing forest management certification)
- ISO/IEC 17065 (Requirements for certification bodies providing chain of custody certification)
- ISO 19011:2011 (Competence requirements for chain of custody certification auditors)

The procedures are clearly structured. One observation⁶ is made:

- The reference in PEFC D 1003-1:2015 clause 9.3.1a (“ch. 9.2.3.1.1”) does not exist.

Additionally, two (2) nonconformities were found, which are both classified as minor.

10.2. Results

The nonconformities found in the Certification and Accreditation Procedures are presented in the tables below.

Requirement	12. Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?
Evidence	<p>PEFC D 1003-1:2015</p> <p>“9.2.2.2.2 The evaluation shall include the following tasks of the regional working group according to PEFC D 1001:</p> <p>a) Effectiveness of the participatory processes for regional certification (ch. 6, PEFC D 1001);”</p> <p>PEFC D 1001-1:2020</p> <p>“6.3.7 Where the confirmation is issued by the PEFC Germany Secretariat based on 5.3, the confirmation also provides the participant with the right to use the PEFC logo (the PEFC logo usage license), provided that the participant has signed a logo usage contract.”</p> <p>Explanation provided by PEFC Germany</p> <p>“Will be included in a revised PEFC D 1003-1 after discussion with the German Accreditation Body. The GFCC has already agreed on this change on 2nd December.”</p>
Assessors' comments	In the current versions the clauses ensure that the <u>right</u> of a group participant to use the PEFC logo is audited. However, it is insufficiently ensured that the certification body shall also carry out controls of the PEFC logo <u>usage</u> . As long as PEFC D 1003-1 is not yet updated accordingly, the nonconformity remains.
Result	Does not conform – minor
CAR	Provide evidence to show conformity or update the standard

⁶ Observations are weaknesses found in the Scheme, which are not considered to be a nonconformity.



Requirement	13. Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?
Evidence	<p>PEFC D 1003-1:2015</p> <p>“9.1.1 All the requirements given in clause 9.1 of ISO/IEC 17021:2015 apply.</p> <p>9.3.1 The surveillance audit shall be planned and implemented to evaluate:</p> <p>a) Matters of stage 1 audits (ch. 9.2.3.1.1) where significant changes have occurred regarding the organisation of the regional working group, its documentation or the framework conditions within which the group works.”</p> <p>Explanation provided by PEFC Germany</p> <p>“The correct reference in ISO 17021 is 9.1.3.3 saying: surveillance audit at least once a calendar year, 1st surveillance audit not more than 12 months after initial audit. So there is only a minimal deviation between the international PEFC requirement and ISO 17021”</p>
Assessors' comments	<p>No reference is found that the maximum period for surveillance audits shall not exceed more than one year. It shall be noted that ISO/IEC 17021:2015 (which is applicable here) requires at least once per calendar year, which still leaves room to exceed one year (12 months).</p> <p>Observation: the reference in clause 9.3.1a (“ch. 9.2.3.1.1”) does not exist.</p>
Result	Does not conform – minor
CAR	Provide evidence to show conformity or update the standard



11. Other aspects

This chapter presents other findings of the assessment of the Scheme. With regards to Scheme Administration Procedures, the following procedures were found:

- **Notification of Certification Procedures**
These procedures are elaborated in PEFC D 4007:2015 PEFC notification of certification bodies;
- **PEFC Logo Usage Licensing**
These procedures are elaborated in PEFC D 4006:2014 Issuance of licenses for PEFC logo usage and for [PEFC D] label usage, with compliance reference to the PEFC requirements as stipulated in PEFC ST 2001:2020 PEFC Trademarks Rules – Requirements;
- **Complaints and Dispute Resolution Procedures**
These procedures are elaborated in PEFC D 4005:2014 Dispute settlement procedures.

It shall be noted that the conformity of these procedures with respectively chapter 5, 6 and 8 of PEFC GD 1004:2009 Administration of PEFC scheme is not further assessed in detail, in accordance with tender document for this assignment. Further assessment of these procedures is conducted by the Technical Unit of PEFC Council.



Annex 1 PEFC Checklists

The tables below present the PEFC Checklists, in which the following formatting is applied in the “reference” column:

- **Bold text** – Source of the quotation
- “Text between quotation marks” – Quotation from either standard, procedures, legislation, response from Applicant Scheme, minutes etc.
- *Italic text* – Comments made by the Assessor.

Part I: PEFC Checklist for Standard-setting Procedures and process

1 Scope

Part I covers the requirements for Standard-setting Procedures and process as defined in the revised 2017 issue of PEFC ST 1001, Standard-setting – Requirements.

Checklist

PEFC benchmark requirement	Assess. 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	PEFC D 0001:2020 6.1 PEFC Germany 6.1.1 PEFC Germany is a registered association of a variety of stakeholders (...) and administers the PEFC scheme. 6.1.2 PEFC Germany is responsible for the following: a) Standard setting, 6.1.3 PEFC Germany is not involved in the certification and accreditation process. PEFC D 4001:2019 Version 2 “2. Responsibilities



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>2.1 German Forest Certification Council</p> <p>(...) GFCC is responsible for “deciding on certification criteria and indicators for sustainable forest management as well as on the description of the system”. Furthermore, it sets up working group(s), assigns their members and determines the chairperson of the working group(s) (...). Consequently, the GFCC also rules the commencement and the time schedule of the revision process.</p> <p>2.3 Working group(s)</p> <p>One or two working group(s) shall be installed to manage the revision process. The working group(s) shall deal with the development of the indicators for the regional level, the criteria for sustainable forest management on the operational level as well as all other normative and procedural documents.4.</p> <p>Working Group Meetings</p> <p>(...) The decisions of the working group to publish the working draft and to recommend the final draft to the GFCC for formal approval shall be based on consensus.</p> <p>6. Final decision</p> <p>(...) the working group(s) elaborate a final draft based on the comments from the consultations. This draft is presented to the GFCC for approval”</p>
(b) procedures for keeping documented information,	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“7. Documentation</p> <p>To ensure transparency and public availability, all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany within 14 days after formal approval. The same holds for the report on the revision process, particularly including information on how comments of complaints were dealt with.</p> <p>With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years:</p> <ul style="list-style-type: none"> a) Description of the revision process. b) Public announcements, e.g. about the start of the revision process, the seminar or the consultation period. c) Minutes of the GFCC meeting. d) Minutes of the working group meetings. e) Proofs for consensus, e.g. summary of the controversial issues and their settlement



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>f) Documentation of the public seminar.</p> <p>g) Documentation of the comments or complaints received.</p> <p>h) Proposal for transition periods for the implementation of the new standards and procedures.”</p>
(c) procedures for balanced representation of stakeholders,	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“The following interest groups shall be represented in the working group(s):</p> <ul style="list-style-type: none"> a) Representatives of private forests b) Representatives of state forests c) Representatives of communal forests d) Timber, pulp and paper industry, trade e) Environmental NGOs f) Trade Unions g) Other representations of forestry (German Forestry Council, Agricultural Chambers) h) Other user groups (consumer organisation, tourism associations) i) Forest contractors j) Science <p>A balanced mix of members of the working group(s) with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process.”</p>
(d) the standard-setting process,	Procedures	YES	<p><i>PEFC D 4001:2020 is the procedure elaborating the requirements for standard-setting, which includes responsibilities (chapter 2), preparation of the revision process (chapter 3), working group meetings (chapter 4), consultation (chapter 5) and final decision (chapter 6).</i></p>
(e) the mechanism for reaching consensus, and	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“4. Working group meetings</p> <p>(...) The chairperson of the working group is responsible for the judgement on whether there is sufficient support. (...)</p> <p>To reach consensus the working group can utilise the following alternative processes to establish whether there is opposition (...) to the standard (...):</p> <ul style="list-style-type: none"> a) a face-to face or telephone conference meeting, or combinations of thereof, where there is a verbal yes/no vote;



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>b) a face-to face meeting where there is a show of hands for a yes/no vote;</p> <p>c) a face-to face meeting where there is a “secret ballot” of members on a yes/no vote;</p> <p>d) a statement on consensus by the chairperson at a face-to face meeting where there are no dissenting voices or hands (votes);</p> <p>e) an e-mail meeting where a request for agreement is provided to members and the members providing a written response.”</p>
(f) review and revision of standard(s)/normative document(s).	Procedures	YES	<i>PEFC D 4001:2019 describes the procedures for the revision of standard(s). The German PEFC scheme does not include an option for reviews, and always requires a full revision.</i>
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>PEFC D 4001:2019 Version 2</p> <p>“1. Objectives</p> <p>This document specifies the procedure for the revision of the normative documents and of the forms and tools within the German PEFC scheme. It must be undertaken every five years with the purpose to ensure objectivity, efficiency, transparency and consensus among the participating stakeholders.</p> <p>For the development of new standards and for time-critical revisions, i. e. revisions between two periodic reviews in a fast-track procedure, the requirements described in Annex 1 also apply.</p> <p>For standard setting, PEFC Germany promotes the participation of a wide spectrum of stakeholders. The procedure shall be open and transparent and lead to consensus among all participants.</p> <p>The document shall be regularly revised and adapted at least every five years considering comments of interested parties. The document is publicly available.”</p>
	Process	YES	<p>#8_190820 Public announcement 20 August 2019 (pefc.de, translated with Google Translate)</p> <p>“The process of revising the PEFC standards for sustainable forest management has started (...) In addition, all interested parties have the opportunity to deliver their own proposals for improving the PEFC standards under www.pefc.de/revision-a The standards and procedures developed by PEFC Germany must be reviewed every five years as part of a revision process (...). When revising the standard, PEFC attaches particular importance to a multi-stakeholder process, which should enable all interest groups to comment on the PEFC standards and to contribute to the design.”</p> <p>Explanation provide by PEFC Germany</p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			“See #6, the dropdown menu “Andere Standards/Dokumente” included the standard revision procedure; no comments have been received on this document (see # 14)”
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	PEFC D 4001:2019 Version 2 “1. Objectives This document specifies the procedure for the revision of the normative documents and of the forms and tools within the German PEFC scheme. (...) The document is publicly available.”
	Process	YES	<i>PEFC D 4001:2019 was found on the website of PEFC Germany (pefc.de).</i>
(b) Stakeholder identification mapping,	Procedures	YES	PEFC D 4001:2019 Version 2 “2.2 (...) The secretariat (...) organises the working group meetings, the minutes, the compilation of the drafts as well as the documentation of the revision for the application at PEFC international. 3.3 Appointment of working group(s) Associations and organisations listed among the stakeholders in 2.3 are identified by the PEFC secretariat. (...) Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person.” <i>For the application at PEFC International, PEFC GD 1007 is applicable, which also requires to include the stakeholder identification mapping. Therefore, it can be concluded that the secretariat will keep the stakeholder identification mapping.</i>
	Process	YES	<i>The stakeholder mapping was found.</i>
	Procedures	YES	PEFC D 4001:2019 Version 2 “2.2 (...) The secretariat (...) organises the working group meetings, the minutes, the compilation of the



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
(c) Contacted and/or invited stakeholders,			<p>drafts as well as the documentation of the revision for the application at PEFC international.</p> <p>3.3 Appointment of working group(s)</p> <p>Associations and organisations listed among the stakeholders in 2.3 are identified by the PEFC secretariat. (...) Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person.”</p> <p><i>For the application at PEFC International, PEFC GD 1007 is applicable, which also requires to include the stakeholder identification mapping, invitation to stakeholders and comments received. Therefore, it can be concluded that the secretariat will keep this information.</i></p>
	Process	YES	<i>Examples of an E-mail invitation and the contacted stakeholders were found.</i>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“2.2 PEFC secretariat</p> <p>Between two standard revisions, the PEFC secretariat collects feedback on the standards via a corresponding website, which will be presented to the working groups at their first meeting. The PEFC secretariat is also responsible for announcing the commencement of the revision, possibilities of participation, the consultations and the outcomes of the standard revision process. The secretariat identifies the relevant organisations and officially invites them. Furthermore, it organises the working group meetings, the minutes, the compilation of the drafts as well as the documentation of the revision for the application at PEFC international.</p> <p>7. Documentation</p> <p>(...) With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years:</p> <ul style="list-style-type: none"> a) Description of the revision process. b) Public announcements, e.g. about the start of the revision process, the seminar or the consultation period. c) Minutes of the GFCC meeting. d) Minutes of the working group meetings. e) Proofs for consensus, e.g. summary of the controversial issues and their settlement f) Documentation of the public seminar. g) Documentation of the comments or complaints received.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			h) Proposal for transition periods for the implementation of the new standards and procedures.” <i>Stakeholders involved in the standard-setting activities are assumed to be listed in the minutes of meetings and documentation of seminars and of comments or complaints received.</i>
	Process	YES	<i>The attendance lists of each of the Working Group meetings, the Taskforce meetings and the public consultation were found.</i>
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	YES	PEFC D 4001:2019 Version 2 “7. Documentation To ensure transparency and public availability, all drafts and the final documents (...) shall be published on the website (...). The same holds for (...) information on how comments of complaints were dealt with. (...) the following documents shall be collected and kept for at least five years: (...) g) Documentation of the comments or complaints received.
	Process	YES	<i>A document was found containing comments received and how the feedback was addressed by the working group.</i>
(f) All drafts and final versions of the standard,	Procedures	YES	PEFC D 4001:2019 Version 2 “7. Documentation To ensure transparency and public availability, all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany within 14 days after formal approval.”
	Process	YES	<i>The various drafts and final version of the standard were found.</i>
(g) Outcomes from working group considerations,	Procedures	YES	PEFC D 4001:2019 Version 2 “7. Documentation (...) With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years: (...) d) Minutes of the working group meetings.”
	Process	YES	<i>Various documents were found with minutes and outcomes of the (sub)working group meetings.</i>
(h) Evidence of consensus on the final	Procedures	YES	PEFC D 4001:2019 Version 2 “7. Documentation



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)											
version of the standard(s),			(...) With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years: (...) e) Proofs for consensus, e.g. summary of the controversial issues and their settlement”											
	Process	YES	#60_201124 GFCC Meeting 24 November 2020 (translated by Google Translate) “After Dirk Teegelbekkers presented the changes, which had been passed by the "Standard Revision" working group on October 27/28, 2020 in Göttingen where consensus was reached, the GFCC only makes an editorial change (reformulation of points 3.2 and 4.2 in PEFC D 1002-3).” <i>Observation: Although reference is made in the minutes of the GFCC Meeting, no minutes of the fourth WG were found in which the consensus was reached.</i>											
(i) Evidence relating to the review process, and	Procedures	N.A.	<i>PEFC Germany indicates that there is no option of reviews, because a normal revision is always required following document PEFC D 4001:2019.</i>											
	Process	N.A.	<i>No review of the standard was conducted, as PEFC Germany indicates that only normal revisions of the standards are possible.</i>											
(j) Final approval by the standardising body.	Procedures	YES	PEFC D 4001:2019 Version 2 “7. Documentation (...) With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years: (...) c) Minutes of the GFCC meeting.”											
	Process	YES	#60_201124 GFCC Meeting 24 November 2020 (translated by Google Translate) “TOP 5 Adoption of the new PEFC standards The decision to include the following revised documents in the German PEFC system was taken unanimously by the GFCC (without abstentions): <table border="1"><tr><th>Bezeichnung</th><th>Titel</th></tr><tr><td>PEFC D 1001</td><td>Regionale Waldzertifizierung – Anforderungen</td></tr><tr><td>PEFC D 1002-1</td><td>PEFC-Standards für nachhaltige Waldbewirtschaftung</td></tr><tr><td>PEFC D 1002-3</td><td>PEFC-Standards für Erholungs-/Kur- und Heilwald</td></tr><tr><td>PEFC D 1003-3</td><td>Anforderungen an Zertifizierungsstellen im Bereich Zertifizierung von Erholungs-/Kur- und Heilwald</td></tr><tr><td>PEFC D 4004</td><td>Verfahren und Kriterien zur Anerkennung von Forstunternehmerzertifikaten</td></tr></table>	Bezeichnung	Titel	PEFC D 1001	Regionale Waldzertifizierung – Anforderungen	PEFC D 1002-1	PEFC-Standards für nachhaltige Waldbewirtschaftung	PEFC D 1002-3	PEFC-Standards für Erholungs-/Kur- und Heilwald	PEFC D 1003-3	Anforderungen an Zertifizierungsstellen im Bereich Zertifizierung von Erholungs-/Kur- und Heilwald	PEFC D 4004
Bezeichnung	Titel													
PEFC D 1001	Regionale Waldzertifizierung – Anforderungen													
PEFC D 1002-1	PEFC-Standards für nachhaltige Waldbewirtschaftung													
PEFC D 1002-3	PEFC-Standards für Erholungs-/Kur- und Heilwald													
PEFC D 1003-3	Anforderungen an Zertifizierungsstellen im Bereich Zertifizierung von Erholungs-/Kur- und Heilwald													
PEFC D 4004	Verfahren und Kriterien zur Anerkennung von Forstunternehmerzertifikaten													



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			After Dirk Teegelbeekers presented the changes, which had been passed by the "Standard Revision" working group on October 27/28, 2020 in Göttingen, a consensus was reached, the GFCC only makes an editorial change (reformulation of points 3.2 and 4.2 in PEFC D 1002-3)."
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	PEFC D 4001:2019 Version 2 "7. Documentation (...) With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years (...)"
	Process	N.A.	<i>Documented information is available at the time of this assessment. Documented information on the process could also be found on the PEFC Germany website (pefc.de).</i>
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	NO	PEFC D 4001:2019 Version 2 "7. Documentation To ensure transparency and public availability, all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany within 14 days after formal approval." <i>No reference is found in the procedures that documented information listed under requirement 5.2.1 (other than drafts and final documents) shall be available to interested parties upon request.</i>
	Process	YES	<i>The website of PEFC Germany (pefc.de) contains documents on the standard revision process which are accessible.</i>
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:			
(a) acknowledge receipt of the complaint or appeal to the complainant,	Procedures	YES	PEFC D 4005:2014 V2 "1. Scope 1.1 This guideline details procedures for complaints and appeals to PEFC Germany which concern decisions and/or activities related to PEFC Germany, including standard setting 3.1 Appeal



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Written request by any person or organisation (the appellant) for reconsideration of any decision affecting the appellant made by PEFC Germany's bodies where the appellant considers such decision have been taken in breach of the PEFC Germany's requirements or procedures.</p> <p>Note: Such adverse decisions may include, for example:</p> <ul style="list-style-type: none"> - Rejection; suspension; or termination of PEFC Germany's membership, - Rejection of application for usage of the PEFC Logo; - Refusal of application for the notification of certification bodies. <p>3.2 Complaint</p> <p>Written expression of dissatisfaction (other than appeal) by any person or organization which relates to the activities of PEFC Germany.</p> <p>4.2 It is the responsibility of the complainant/ appellant to submit written information which can be verified as accurate and correct through an independent source.</p> <p>4.3 The PEFC Germany's Secretary General decides on formal acceptance of the complaint/ appeal provided that the complaint/appeal is in accordance with 3.2/3.1 and the information supporting the complaint/appeal can be authenticated as being in compliance with 4.2.</p> <p>The PEFC Germany's Secretary General shall without delay:</p> <ul style="list-style-type: none"> a) acknowledge to the complainant/ appellant (in writing) the receipt and acceptance/rejection of the complaint/ appeal, including its justification; b) provide the complainant/appealant with details of the PEFC Germany's complaints and appeals procedures to ensure that they are clearly understood;"
	Process	N.A.	<i>The procedures for complaints and appeals could be found on the website of PEFC (pefc.de). According to PEFC Germany no formal complaint was received during the process. This was confirmed by respondents in the stakeholder survey.</i>
(b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the	Procedures	YES	<p>PEFC D 4005:2014 V2</p> <p>"5.1 The PEFC Germany's Chairperson shall assign an ad-hoc Task Force Group (the TFG), comprising one or more persons, to investigate the accepted complaint or appeal. The members of the TFG shall have no vested or conflict of interest in the complaint or appeal. Alternatively, in justified circumstances, the TFG may have balanced representation of concerned parties.</p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal,			5.2 The TFG shall undertake a thorough investigation and seek a resolution. The TFG shall submit in a timely matter, a detailed written report, to the PEFC Germany's Chairperson to be presented to the Board of Directors. The report shall include a statement indicating whether, or not, the complaint or appeal has been substantiated and recommendations on resolving the complaint/ appeal. Note: It is expected that complaints not requiring an on-site investigation should normally be investigated by the TFG within 1 month."
	Process	N.A.	<i>According to PEFC Germany no formal complaint was received during the process.</i>
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.	Procedures	YES	PEFC D 4005:2014 V2 "5.4 The PEFC Germany's Secretary General shall, without delay, inform the complainant/ appellant and other interested parties about the sequence of actions and the outcomes of the complaint/ appeal resolution process, in writing."
	Process	N.A.	<i>According to PEFC Germany no formal complaint was received during the process.</i>
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	PEFC D 4001:2019 Version 2 "2.2 PEFC secretariat Between two standard revisions, the PEFC secretariat collects feedback on the standards via a corresponding website (...). The PEFC secretariat is also responsible for announcing the commencement of the revision, possibilities of participation, the consultations and the outcomes of the standard revision process. The secretariat identifies the relevant organisations and officially invites them. Furthermore, it organises the working group meetings, the minutes, the compilation of the drafts as well as the documentation of the revision for the application at PEFC international." PEFC D 4005:2014 V2 "4.1 All complaints and appeals shall be addressed in writing to PEFC Germany's Secretariat." <i>Although not specifically mentioned, from the references it is concluded that the PEFC Germany's secretariat is the contact point for enquiries relating to the standard setting activities.</i>
	Process	YES	Contact page of PEFC Germany (https://pefc.de/kontakt/, translated with Google Translate) "Any questions? Do you need documents? The PEFC office is there for you. Our postal address



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>PEFC Deutschland e.V. Tübinger Straße 15 70178 Stuttgart Tel. +49 711 2484006 Fax +49 711 2484031 E-Mail: info@pefc.de”</p> <p><i>Evidence of names, E-mail addresses, and phone numbers of various PEFC Germany employees in different regions are provided on the PEFC Germany website.</i></p>
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	<p>PEFC D 4001:2019 Version 2, Annex I</p> <p>“1. For the preparation of a new standard, the German Forest Certification Council shall prepare a proposal containing the following: a) the scope of the standard,”</p>
	Process	N.A.	<i>During this revision, no new standard was developed</i>
(b) a justification of the need for the standard,	Procedures	YES	<p>PEFC D 4001:2019 Version 2, Annex I</p> <p>“b) a justification for the need for the standard,”</p>
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
(c) a clear description of the intended outcomes	Procedures	YES	<p>PEFC D 4001:2019 Version 2, Annex I</p> <p>“c) a clear description of the intended results,”</p>
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
(d) a risk assessment of potential negative impacts arising from implementing the standard, such as	Procedures	YES	<p>PEFC D 4001:2019 Version 2, Annex I</p> <p>“d) a risk assessment of possible negative effects resulting from the implementation of the standard, such as - factors that could have a negative impact on the achievement of the outcomes, - unintended consequences of implementation,</p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
<ul style="list-style-type: none"> • factors that could affect the achievement of the outcomes negatively, • unintended consequences of implementation, • actions to address the identified risks, and 			- measures to address the identified risks and"
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
(e) a description of the stages of standard development and their expected timetable. ⁷	Procedures	YES	PEFC D 4001:2019 Version 2, Annex I "e) a description of the phases of the standard development and an anticipated timeline."
	Process	N.A.	<i>During this revision, no new standard was developed.</i>
6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.	Procedures	YES	PEFC D 4001:2019 Version 2 "3.1 Announcement (...) The commencement of the revision process shall timely (...) be communicated to the public in an appropriate way (e.g. press release, newsletter). This communication shall inform about the objectives, the scope, the schedule and the opportunities for participation."
	Process	YES	#8_190820 Public announcement 20 August 2019 (pefc.de, translated with Google Translate) "The standards and procedures developed by PEFC Germany must be reviewed every five years as part of a revision process - according to the requirements of the international PEFC Council, which monitors the national systems. When revising the standard, PEFC attaches particular importance to a multi-stakeholder process, which should enable all interest groups to comment on the PEFC standards and to contribute to the design. Germany is going through this standard revision process for the fourth time. In the last three revision processes, the German PEFC standard was expanded to include, for example, the protection of self-procured firewood, the requirement for forest entrepreneurs with a forest entrepreneur certificate and certification criteria for recreational forests and sustainable Christmas tree cultures."

⁷ NOTE Guidance for development of a proposal and justification is given in ISO Directives, Part 1, Annex C and Annex SL (Appendix 1).



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>Public announcement 3 July 2019 (pefc.de, translated with Google Translate)</p> <p>“The further schedule of the PEFC standard revision now provides for the following steps:</p> <ul style="list-style-type: none"> • Invitation to participate in the working group (July / August 2019) • Appointment of the working group members by the German Forest Certification Council (September 2019) • Constituent meeting of the working group (December 2019) • Working group meetings (January - October 2020) and public seminar to present and discuss the revision proposals (July 2020) • Adoption of the new standard by the DFZR (November / December 2020)”
6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each stakeholder group the standardising body shall identify the likely key issues, key stakeholders, and which means of	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>2.3 Working group(s)</p> <p>(...) The following interest groups shall be represented in the working group(s):</p> <ul style="list-style-type: none"> a) Representatives of private forests b) Representatives of state forests c) Representatives of communal forests d) Timber, pulp and paper industry, trade e) Environmental NGOs f) Trade Unions g) Other representations of forestry (German Forestry Council, Agricultural Chambers) h) Other user groups (consumer organisation, tourism associations) i) Forest contractors j) Science <p>A balanced mix of members of the working group(s) with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process.</p> <p>3.3 Appointment of working group(s)</p> <p>Associations and organisations listed among the stakeholders in 2.3 are identified by the PEFC secretariat and their likely key issues are identified. They are invited timely, using the means of</p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
communication would be best to reach them.			<p>communication by which they can best be reached publicly and in an appropriate way to send delegates and participate in the revision process.</p> <p>Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person.</p> <p>In addition, the members of PEFC Germany (according to § 3 of the statutes) and the members of the regional PEFC working group(s) (according to ch. 2.1, 1001:2009) can participate in the working group(s). They are also entitled to propose other persons to become member of the working group(s)."</p>
	Process	YES	<p>Explanation provided by PEFC Germany</p> <p>"We treated every stakeholder, which may be interested in SFM and forest certification, as key stakeholder. (...) you will not find an organisation in Germany (fulfilling these two criteria) which has not been part of our invitation list (#4).</p> <ul style="list-style-type: none"> • Key issues could be submitted by them in the course of the pre-revision-consultation (#6) • We used the best way to contact these stakeholders: by a postal mailing." <p><i>In evidence #6_190814 an opportunity is provided for stakeholders to identify issues or changes.</i></p> <p><i>A stakeholder identification map was found (#4_190814) with relevant stakeholders as defined by the secretariat (SRR 4.3).</i></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:	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>2.3 Working group(s)</p> <p>One or two working group(s) shall be installed to manage the revision process. The working group(s) shall deal with the development of the indicators for the regional level, the criteria for sustainable forest management on the operational level as well as all other normative and procedural documents.</p> <p>The following interest groups shall be represented in the working group(s):</p> <ol style="list-style-type: none"> Representatives of private forests Representatives of state forests Representatives of communal forests Timber, pulp and paper industry, trade Environmental NGOs Trade Unions Other representations of forestry (German Forestry Council, Agricultural Chambers)



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
<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.⁸</p>			<p>h) Other user groups (consumer organisation, tourism associations)</p> <p>i) Forest contractors</p> <p>j) Science</p> <p>A balanced mix of members of the working group(s) with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process</p> <p><i>It shall be noted that indigenous people do not exist in Germany.</i></p>
	Process	YES	<p><i>A more elaborate stakeholder map (supplementing #4_190814) shows that all major stakeholder groups (as set out in the procedures) were identified.</i></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.⁹</p>	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“3.3 (...) Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person.”</p> <p><i>It shall be noted that in the German context there are no disadvantaged stakeholders.</i></p>
	Process	YES	<p>Explanation provided by PEFC Germany</p> <p>“in Germany no disadvantaged stakeholders exist. All German stakeholders have the possibility to receive documents and participate in WG meetings. The invitation list #4 contains all major groups dealing with forestry and potentially interested in SFM and forest certification.”</p>

⁸ NOTE The full list of nine major stakeholder groups defined by Agenda 21 of the *United Nations Conference on Environment and Development* consists of: (i) business and industry, (ii) children and youth, (iii) forest owners, (iv) indigenous peoples, (v) local authorities, (vi) non-government organisations, (vii) scientific and technological community, (viii) women, and (ix) workers and trade unions.

⁹ NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
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 ¹⁰ through suitable media ¹¹ , as appropriate, to give stakeholders an opportunity for meaningful contributions.	Procedures	YES	PEFC D 4001:2019 Version 2 “3.1 Announcement (...) The commencement of the revision process shall timely – at latest four week before the first meeting of the working group – be communicated to the public in an appropriate way (e.g. press release, newsletter). This communication shall inform about the objectives, the scope, the schedule and the opportunities for participation. The procedures of the standard revision shall also be referred to and participants shall be invited to comment on its scope and contents.”
	Process	YES	#8_190820 Public announcement 20 August 2019 (pefc.de, translated with Google Translate) “The process of revising the PEFC standards for sustainable forest management has started - this is how you can get involved: <ul style="list-style-type: none"> • Register your interest in working in the working group on the PEFC standard revision by the end of September 2019 at www.pefc.de/revision-m • Then the German Forest Certification Council (DFZR) officially names the working group members • The constituent working group meeting will take place on December 10, 2019 in Göttingen • In addition, all interested parties have the opportunity to deliver their own proposals for improving the PEFC standards under www.pefc.de/revision-a If you have any questions or suggestions about the revision process, you can contact the PEFC office at info@pefc.de .” <i>Evidence is found of invitations to stakeholders to participate in the process, and of a public announcement on PEFC Germany’s website to participate in the standard revision process. These announcements were made more than four weeks before the first standard-setting activity was scheduled to occur.</i>
6.3.1 The announcement and invitation shall include:			
	Procedures	YES	PEFC D 4001:2019 Version 2

¹⁰ NOTE 1 *In a timely manner* means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.

¹¹ NOTE 2 *Through suitable media* 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 trade-press, information sent to branch organisations, social media, digital media, etc.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
(a) overview of the standard-setting process,			<p>“3.1 Announcement</p> <p>(...) This communication shall inform about the objectives, the scope, the schedule and the opportunities for participation. The procedures of the standard revision shall also be referred to”</p>
	Process	YES	<p>#5_190814 Invitation to stakeholders 14 August 2019 (translated with Google Translate)</p> <p>“Every five years, PEFC Germany puts its standards and procedures to the test. With this we meet a requirement of PEFC International and follow our claim to continuous improvement. (...) Over the next 15 months, you will have the opportunity to contribute your ideas and your ideas in various phases of the revision process:</p> <ul style="list-style-type: none"> • Participation in the PEFC working group • Use of the Internet forum to submit suggestions for improvement (by the end of November) • Discussion of the first draft standard at a congress in summer 2020 • Participation in the public consultation on the second draft standard (60 days) <p>If you are interested in participating in the responsible working group, please fill out the form at the following link by September 27, 2019: www.pefc.de/revision-m”</p>
(b) access to the proposal for the standard (refer to 6.1),	Procedures	NO	<p>PEFC D 4001:2019 Version 2</p> <p>“1. (...) The document shall be regularly revised and adapted at least every five years considering comments of interested parties. The document is publicly available.</p> <p>3.1 Announcement</p> <p>(...) This communication shall inform about the objectives, the scope, the schedule and the opportunities for participation. The procedures of the standard revision shall also be referred to”</p> <p><i>For a revision, the proposal must include the scope (which is the standard to be revised) and the stages and timelines, which is covered in clause 3.1.</i></p> <p><i>However, for the development of a new standard, no reference is found that the announcement and invitation shall include access to the proposal for the standard. It shall be noted that no new standard was developed during this revision process, which makes the missing element not an issue for the current process. It however remains a gap in the procedures for future standard-setting processes, where new standards (e.g. TOF) might be developed.</i></p>
	Process	YES	<p>#5_190814 Invitation to stakeholders 14 August 2019 (translated with Google Translate)</p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>“Over the next 15 months, you will have the opportunity to contribute your ideas and your ideas in various phases of the revision process:</p> <ul style="list-style-type: none"> • Participation in the PEFC working group • Use of the Internet forum to submit suggestions for improvement (by the end of November) • Discussion of the first draft standard at a congress in summer 2020 • Participation in the public consultation on the second draft standard (60 days) <p>If you are interested in participating in the responsible working group, please fill out the form at the following link by September 27, 2019: www.pefc.de/revision-m</p> <p>If you do not work in the AG and still want to submit suggestions for revising the PEFC standards, we have activated an online platform for you under the following link: www.pefc.de/revision-a”</p>
(c) information about opportunities for stakeholders to participate in the process,	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“3.1 Announcement</p> <p>(...) This communication shall inform about the objectives, the scope, the schedule and the opportunities for participation. (...) participants shall be invited to comment on its scope and contents.”</p>
	Process	YES	<p>#5_190814 Invitation to stakeholders 14 August 2019 (translated with Google Translate)</p> <p>“Over the next 15 months, you will have the opportunity to contribute your ideas and your ideas in various phases of the revision process:</p> <ul style="list-style-type: none"> • Participation in the PEFC working group • Use of the Internet forum to submit suggestions for improvement (by the end of November) • Discussion of the first draft standard at a congress in summer 2020 • Participation in the public consultation on the second draft standard (60 days) <p>If you are interested in participating in the responsible working group, please fill out the form at the following link by September 27, 2019: www.pefc.de/revision-m</p> <p>If you do not work in the AG and still want to submit suggestions for revising the PEFC standards, we have activated an online platform for you under the following link: www.pefc.de/revision-a”</p>
(d) requests to stakeholders to	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“3.3 Appointment of working group(s)</p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
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,			(...) They are invited timely, publicly and in an appropriate way to send delegates and participate in the revision process. Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person."
	Process	YES	#5_190814 Invitation to stakeholders 14 August 2019 (translated with Google Translate) "If you are interested in participating in the responsible working group, please fill out the form at the following link by September 27, 2019: www.pefc.de/revision-m " <i>PEFC Germany noted that disadvantaged stakeholders do not exist in Germany and that all stakeholders were treated as key stakeholders. Invitations were sent by postal mailing and via e-mail to make sure recipients received the request.</i>
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	YES	PEFC D 4001:2019 Version 2 "3.1 Announcement (...) This communication shall inform about the objectives, the scope, the schedule and the opportunities for participation. The procedures of the standard revision shall also be referred to and participants shall be invited to comment on its scope and contents."
	Process	YES	#8_190820 Public announcement 20 August 2019 (pefc.de, translated with Google Translate) "If you have any questions or suggestions about the revision process, you can contact the PEFC office at info@pefc.de ." <i>PEFC Germany uses internet links plus QR codes to provide opportunity to submit feedback, which is an easy and practical way for stakeholders to submit their feedback.</i>
(f) access to the standard-setting procedures.	Procedures	YES	PEFC D 4001:2019 Version 2 "1. Objectives This document specifies the procedure for the revision of the normative (...) The document is publicly available. 3.1 Announcement



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			(...) The procedures of the standard revision shall also be referred to"
	Process	NO	<i>The procedures were available on the website and included in the response form. However, the public announcement and invitation to stakeholders both do not provide direct access or reference to the standard-setting procedures.</i>
6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.	Procedures	NO	PEFC D 4001:2019 Version 2 "2.2 (...) Between two standard revisions, the PEFC secretariat collects feedback on the standards via a corresponding website, which will be presented to the working groups at their first meeting." <i>Clause 2.2 ensures that feedback on the standards is used in the process. However, no reference is found that the standardising body will review the proposed standard-setting process (as outlined in the announcement, such as proposed timelines and activities) based on the feedback received in response to the public announcement.</i>
	Process	YES	Explanation provided by PEFC Germany "See #6, the dropdown menu "Andere Standards/Dokumente" included the standard revision procedure; no comments have been received on this document (see # 14). Because no feedback has been received, no review was necessary."
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,	Procedures	YES	PEFC D 4001:2019 Version 2 "2.3 Working group(s) One or two working group(s) shall be installed to manage the revision process. (...) The following interest groups shall be represented in the working group(s): a) Representatives of private forests b) Representatives of state forests c) Representatives of communal forests d) Timber, pulp and paper industry, trade e) Environmental NGOs f) Trade Unions g) Other representations of forestry (German Forestry Council, Agricultural Chambers) h) Other user groups (consumer organisation, tourism associations) i) Forest contractors

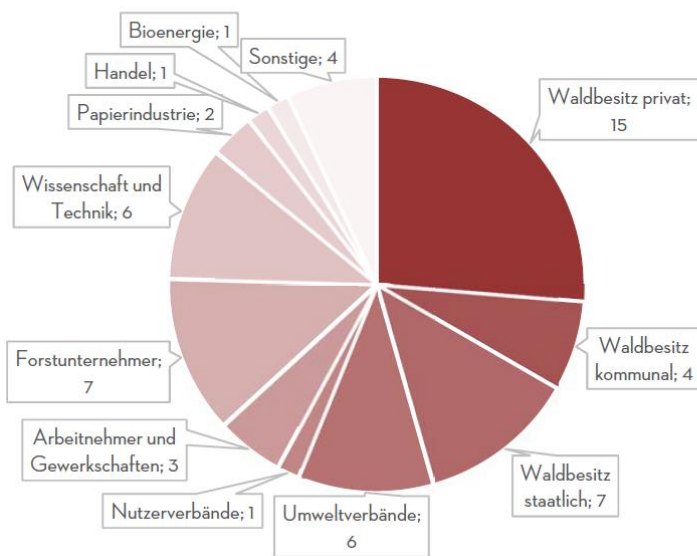



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
considerations of an appropriate gender balance, relevance of the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.			<p>j) Science</p> <p>A balanced mix of members of the working group(s) with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process.</p> <p>3.3 Appointment of working group(s)</p> <p>Associations and organisations listed among the stakeholders in 2.3 are identified by the PEFC secretariat and their likely key issues are identified. They are invited timely, using the means of communication by which they can best be reached publicly and in an appropriate way to send delegates and participate in the revision process. (...) All nominations shall be considered, a rejection of nominated members is not foreseen."</p>
	Process	YES	<p>Standard Revision Report 2019-2020</p> <p>"4.4 Establishment of the working groups</p> <ul style="list-style-type: none"> • By the end of the registration period, 57 persons expressed their interest in participating in the working group "Standard Revision". • A written vote was held in the German Forest Certification Council to officially appoint the WG members. • As a result of this vote, all proposed members were appointed on 05 November 2019. • At the GFCC meeting on 11 December 2019, additional five persons who had been post-nominated for the working group were appointed. The Standard Revision Working Group thus included 62 members (one person resigned his membership before the first WG meeting, a second person during the revision process)." <p>Explanation provided by PEFC Germany</p> <p>"No application was refused, all were accepted, so that none of these criteria had to be applied. (...) these criteria were considered in the process of accepting nominations for membership in the WG:</p> <ul style="list-style-type: none"> • The requirements for balanced representation of the working group = Every interest group should be represented; the number of members per group was not considered as decisive because the voting rules limited the number of votes to 4 per group (see PEFC D 4001, ch. 4, para 3) • Considerations of an appropriate gender balance = Very difficult in the forest sector in Germany which is dominated by men; but we succeeded by having 3 women in the WG



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> • Relevance of the organisation = Except for the interest group “ENGOS” (due to the known reason) all member organisations have been of significant relevance with respect to the interest group they represented. • An individual’s competence / An individual’s relevant experience = The vast majority of members nominated for the WG was well known to the GFCC so that the GFCC could make an informed decision based on their competence / experience. • And resources available for standard-setting = Not relevant in the German context.”
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>PEFC D 4001:2019 Version 2</p> <p>“2.3 Working group(s)</p> <p>(...) The following interest groups shall be represented in the working group(s):</p> <ul style="list-style-type: none"> a) Representatives of private forests b) Representatives of state forests c) Representatives of communal forests d) Timber, pulp and paper industry, trade e) Environmental NGOs f) Trade Unions g) Other representations of forestry (German Forestry Council, Agricultural Chambers) h) Other user groups (consumer organisation, tourism associations) i) Forest contractors j) Science <p>A balanced mix of members of the working group(s) with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process.</p> <p>Explanation provided by PEFC Germany</p> <p>“Because there is no geographical differentiation in the German PEFC standard (e. g. between mountains and flatlands) there is also no need to reflect this issue in the stakeholder representation.”</p>
	Process	YES	#11_191016



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			  <p>Evidence was found (#11_191016) that the following groups were included in the working group:</p> <ul style="list-style-type: none"> • Private forest ownership • Municipal forest ownership • Forest ownership by the state • Environmental associations • Utility associations • Workers and unions • Forest contractor • Science and technology • Paper industry



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<ul style="list-style-type: none"> • Trade • Bioenergy • Other <p><i>Evidence is given on the geographical distribution and stakeholder categories of the WG members, where the geographical scope of the country is well covered.</i></p> <p><i>Observation: Nearly half of the stakeholders in the WG are forest owners, which is a relatively large group and risks to dominate the group. Also a few respondents in the stakeholder survey found that forest owners were overrepresented and environmental stakeholder and local communities underrepresented. However, the majority of respondents found that there was a balanced representation in the WG.</i></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>PEFC D 4001:2019 Version 2</p> <p>“2.3 Working group(s)</p> <p>(...) The following interest groups shall be represented in the working group(s):</p> <ul style="list-style-type: none"> a) Representatives of private forests b) Representatives of state forests c) Representatives of communal forests d) Timber, pulp and paper industry, trade e) Environmental NGOs f) Trade Unions g) Other representations of forestry (German Forestry Council, Agricultural Chambers) h) Other user groups (consumer organisation, tourism associations) i) Forest contractors j) Science <p>A balanced mix of members of the working group(s) with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process.</p> <p><i>Although no reference is found that the working group includes stakeholders with expertise relevant to the subject matter of the standard, in the German context it can be assumed that (at least) representatives of private, state and communal forests have such expertise.</i></p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<i>From the stakeholder groups represented in the WG (evidence #11_191016) it is clear that the WG included stakeholders that are affected by the standard and those that can influence implementation of the standard (forest owners, industry, forest contractors). Respondents from the stakeholders survey confirmed that the WG members had relevant expertise.</i>
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. ¹² 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.	Procedures	YES	PEFC D 4001:2019 Version 2 “2.3 Working group(s) (...) A balanced mix of members of the working group(s) with respect to these ten groups is aimed at. None of the stakeholders shall dominate the decision process. 3.3 Appointment of working group(s) (...) Stakeholders holding a key position or not having participated in past revisions are identified and personally invited to ensure that these information is received by the respective person” <i>Although no specific targets are defined for the participation of key stakeholders, clause 2.3 requires a balanced mix of the ten groups (which includes key stakeholders), effectively this will result in the participation of key stakeholders.</i>
	Process	YES	Explanation provided by PEFC Germany “the target that all stakeholder groups shall be represented in the WG was fulfilled” <i>Evidence was found (#11_191016) that all stakeholder groups listed in the standard-setting procedures were included in the working group.</i>
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	Procedures	YES	PEFC D 4001:2019 Version 2 “4. Working group meetings

¹² NOTE When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardising body may consider alternative options.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
members of the working group,			(...) The minutes and drafts are provided to all working group members.”
	Process	YES	<p>#44_200617 Invitation to the second WG</p> <p>“Notes on the attachments:</p> <ol style="list-style-type: none"> 1. PEFC D 4001 Procedure for standard revision with advice on how to reach a consensus 2. PEFC D 1002-1 with suggestions from the three sub-working groups, each marked with capital letters (77 points in total) => Basis for the above-mentioned Survey Monkey survey 3. PEFC D 1001 with suggestions from UAGE "Certification Process", including new Annexes 4 and 5 4. PEFC D 1004 / PEFC D 2002-1 with the proposal of UAGE to enable the percentage method for PEFC regional Label 5. PEFC D 1003-2 with a proposal by the UAGD to expand the recreational forest certification to include the components of spa and medicinal forests” <p><i>E-mails to WG members were found which included access to the working drafts. This is confirmed by respondents to the stakeholder survey.</i></p>
(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	<p>PEFC D 4001:2019 Version 2</p> <p>“4. Working group meetings</p> <p>(...) The minutes and drafts are provided to all working group members. All members have the possibility to comment on these. All proposals are documented and discussed within the working group(s).”</p>
	Process	YES	<p><i>Respondents to the stakeholder survey who participated in the WG confirmed that all members had been given meaningful opportunities to contribute to the revision of the standard and to provide feedback on the working drafts.</i></p>
(c) feedback and views given by any member of	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“4. Working group meetings</p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
the working group shall be considered in an open and transparent way where the outcome of these considerations is recorded.			(...) All members have the possibility to comment on these. All proposals are documented and discussed within the working group(s)."
	Process	YES	<i>According to respondents to the stakeholder survey feedback and views given by members were considered in an open and transparent way. The outcome of considerations were found in working drafts of the standards.</i>
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	PEFC D 4001:2019 Version 2 "4. Working group meetings (...) To reach consensus the working group can utilise the following alternative processes to establish whether there is opposition (in terms of the ISO definition) to the standard (draft): a) a face-to face or telephone conference meeting, or combinations of thereof, where there is a verbal yes/no vote; b) a face-to face meeting where there is a show of hands for a yes/no vote; c) a face-to face meeting where there is a "secret ballot" of members on a yes/no vote; d) a statement on consensus by the chairperson at a face-to face meeting where there are no dissenting voices or hands (votes);"
	Process	YES	<i>PEFC Germany has provided photo evidence showing a voting of hands in a face-to-face meeting (partially through video conference) and indicated that a consensus was reached which was confirmed by a statement of the Chair. Respondents to the stakeholder survey who participated in the WG confirmed that a consensus on the final drafts had been reached.</i> <i>Observation: No minutes exist of the 4th WG meeting in which consensus was reached.</i>
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	YES	PEFC D 4001:2019 Version 2 "4. Working group meetings (...) To reach consensus the working group can utilise the following alternative processes to establish whether there is opposition (in terms of the ISO definition) to the standard (draft): a) a face-to face or telephone conference meeting, or combinations of thereof, where there is a verbal yes/no vote;"



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	N.A.	<i>PEFC Germany has indicated that consensus was reached in a face-to-face meeting.</i>
(c) e-mail request to the working group for agreement or objection where the members provide a formal (written) response (vote),	Procedures	YES	PEFC D 4001:2019 Version 2 “4. Working group meetings e) an e-mail meeting where a request for agreement is provided to members and the members providing a written response.”
	Process	N.A.	<i>PEFC Germany has indicated that this method was not applied</i>
(d) combinations of these methods.	Procedures	YES	PEFC D 4001:2019 Version 2 “4. Working group meetings a) a face-to face or telephone conference meeting, or combinations of thereof, where there is a verbal yes/no vote;”
	Process	N.A.	<i>PEFC Germany has indicated that this method was not applied</i>
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	Procedures	YES	PEFC D 4001:2019 Version 2 “4. Working group meetings The working group(s) constitute a quorum, if at least half of all members are present. The decisions of the working group(s) are taken with a three-quarter majority of votes. Each member has one vote. Each interest group has a maximum of 4 votes. If more than 4 members of an interest group are present, they shall mutually decide, who will participate in the voting.”
	Process	YES	Explanation provided by PEFC Germany “the voting in the 4th WG meeting was conducted as showing of hands; the decision-making threshold that quantifies consensus was 100% in favour, i.e. no votes against, no abstentions.”



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
opposition in order to achieve consensus.			
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	PEFC D 4001:2019 Version 2 “4. Working group meetings The controversial issue shall be resolved using the following mechanism: a) discussion and negotiation on the disputed issue within the working group in order to find a compromise,”
	Process	N.A.	Explanation provided by PEFC Germany: “A consensus was always reached” <i>PEFC Germany and respondents to the stakeholder survey indicated that through discussions a consensus was reached and no sustained opposition remained.</i>
(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	PEFC D 4001:2019 Version 2 “4. Working group meetings b) direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different view on the disputed issue in order to find a compromise,”
	Process	N.A.	Explanation provided by PEFC Germany: “A consensus was always reached” <i>PEFC Germany and respondents to the stakeholder survey indicated that through discussions a consensus was reached and no sustained opposition remained.</i>
(c) additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The standardising body	Procedures	YES	PEFC D 4001:2019 Version 2 “4. Working group meetings d) Additional public consultation round(s) (if necessary) when input from other stakeholders may be helpful in reaching consensus on unresolved issues. The GFCC shall determine the scope and duration of any additional public consultation.”
	Process	N.A.	Explanation provided by PEFC Germany: “A consensus was always reached”



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
determines the scope and duration of any additional public consultation.			<i>PEFC Germany and respondents to the stakeholder survey indicated that through discussions a consensus was reached and no sustained opposition remained.</i>
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	PEFC D 4001:2019 Version 2 “4. Working group meetings c) dispute settlement process. Note: The dispute settlement process shall be deduced from the procedural document PEFC D 2003:2009.” PEFC D 4005:2014 V2 “1.1 This guideline details procedures for complaints and appeals to PEFC Germany which concern decisions and/or activities related to PEFC Germany, including standard setting, interpretation of the PEFC Germany standards, logo usage licencing and notification of certification bodies.” <i>Observation: the reference in clause 4c still refers to the old title of the dispute settlement procedures.</i>
	Process	N.A.	<i>According to PEFC Germany no sustained opposition persisted. This is confirmed by respondents to the stakeholder survey.</i>
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 ¹³ through suitable media,	Procedures	YES	PEFC D 4001:2019 Version 2 “5. Consultations (...) The invitation for public consultation, including its commencement and end, shall be made in time – at latest one day before the start of the consultation – and via appropriate channels, e.g. website, e-mail etc.”
	Process	YES	#52_200831 Announcement on public consultation on PEFC Germany website, 26 August 2020 (translated by Google Translate)

¹³ NOTE *In a timely manner* means (at the latest) the day before the start of public consultation.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<p>"The participants at the PEFC conference on August 26, 2020 in Berlin learned about which proposals a consensus could be reached in the "large" working group in June. This was also where the starting shot for the 60-day consultation period was given.</p> <p>You now have until October 25th, 2020 to use an online form to comment on the first drafts of the PEFC working group "Standard Revision" and to submit suggestions for changes."</p> <p><i>The announcement with the start and end dates of the public consultation was placed on the website of PEFC Germany on the same day as the start of the public consultation, not one day before the start. However, it is noted that without the announcement day, the public consultation still lasted for 61 days, and the intend of the requirement is met.</i></p> <p><i>Observation: e-mails to stakeholders were sent but not until 4 September 2020, when the public consultation had already started.</i></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>PEFC D 4001:2019 Version 2</p> <p>"5. Consultations</p> <p>The first draft elaborated by the working group(s) will be presented in a public seminar. This seminar will give everyone, who is not member of the working group, the opportunity to comment on this first draft. After this seminar a public consultation period starts which shall last 60 days at minimum. For this purpose, the draft will be published on the website of PEFC Germany and also provided to the interested public via other channels, if necessary. The invitation for public consultation, including its commencement and end, shall be made in time (...) and via appropriate channels, e.g. website, e-mail etc. The key stakeholders shall be invited in a way that ensures the receipt by the addressee."</p>
	Process	YES	<p>Explanation provided by PEFC Germany:</p> <p>"letters with invitation to participate in the public consultation were only sent to stakeholders whose organisations were not represented in the WG"</p> <p><i>Evidence is found of direct invitations to stakeholders who did not take part in the WG to comment on the enquiry draft (#55_200904).</i></p>
(c) invitations are sent to disadvantaged and key stakeholders by methods that ensure	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>"5. Consultations</p> <p>(...) The key stakeholders shall be invited in a way that ensures the receipt by the addressee."</p> <p><i>It shall be noted that there are no disadvantaged stakeholders in Germany.</i></p>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
they reach recipients and are easy to understand,	Process	YES	Explanation provided by PEFC Germany “in Germany no disadvantaged stakeholders exist. We used the best way to contact these stakeholders: by a postal mailing.”
(d) the enquiry draft is made publicly available,	Procedures	YES	PEFC D 4001:2019 Version 2 “5. Consultations (...) After this seminar a public consultation period starts which shall last 60 days at minimum. For this purpose, the draft will be published on the website of PEFC Germany and also provided to the interested public via other channels, if necessary.”
	Process	YES	#52_200831 Announcement on public consultation on PEFC Germany website, 26 August 2020 (translated by Google Translate) “You now have until October 25th, 2020 to use an online form to comment on the first drafts of the PEFC working group “Standard Revision” and to submit suggestions for changes. So help us to improve the PEFC system. Because certification lives from participating!” <i>In the announcement of the public consultation on the website of PEFC Germany (#52_200831) links to the enquiry drafts of the standards are all available</i>
(e) public consultation is for at least 60 days,	Procedures	YES	PEFC D 4001:2019 Version 2 “5. Consultations (...) After this seminar a public consultation period starts which shall last 60 days at minimum.”
	Process	YES	#52_200831 Announcement on public consultation on PEFC Germany website, 26 August 2020 (translated by Google Translate) “This was also where the starting shot for the 60-day consultation period was given. You now have until October 25th, 2020 to use an online form to comment on the first drafts of the PEFC working group “Standard Revision” and to submit suggestions for changes” <i>The public consultation took 61 days (26 August and 25 October included).</i>
(f) all feedback is considered by the working group in an objective manner, and	Procedures	YES	PEFC D 4001:2019 Version 2 “5. Consultations All comments formulated during the seminar and the consultation are documented and discussed within the working group(s).”



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
	Process	YES	<i>Evidence is found (#56_201025) of comments received and feedback from the working group.</i>
(g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. ¹⁴ The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.	Procedures	YES	PEFC D 4001:2019 Version 2 “5. Consultations (...) All comments formulated during the seminar and the consultation are documented and discussed within the working group(s).”
	Process	YES	#62_201221 Public announcement on PEFC Germany website, 21 December 2020 (translated with Google Translate) “PEFC Germany has now published the report on the standard revision, which documents the process of the revision process in detail. You can call up the report here (...) with Attachment 1 the list of the WG members (...) and Attachment 2 <i>The synopsis of feedback and outcome of the WG is publicly available on the website of PEFC Germany. PEFC Germany also provided an email example showing that participants in the online consultation received an email on 30 November 2020 with the synopsis of feedback and outcome of the WG.</i> ”
6.5.2 For new standards the standardising body shall organise a second round of public consultation lasting at least 30 days.	Procedures	YES	PEFC D 4001:2019 Version 2, Annex 1 “1. (...) Having developed a new standard the GFCC organises another consultation round, which lasts 30 day minimum”
	Process	N.A.	<i>No new standards were developed during this revision.</i>
6.6 The standardising body shall organise pilot testing of new standard(s) ¹⁵ to assess the clarity, auditability	Procedures	YES	PEFC D 4001:2019 Version 2, Annex 1 “1. (...) Having developed a new standard the GFCC organises another consultation round, which lasts 30 day minimum, and a pilot testing.”
	Process	N.A.	<i>No new standards were developed during this revision.</i>

¹⁴ NOTE For clarity the standardising body's synopsis may aggregate responses on material issues where there was similar feedback from different stakeholders. However, best practice would be to publish each piece of original feedback and the response, to allow each stakeholder to identify its own feedback.

¹⁵ NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
and feasibility of the requirements. The working group shall consider the outcome of pilot testing.			
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	PEFC D 4001:2019 Version 2 “4. Working group meetings The decisions of the working group to publish the working draft and to recommend the final draft to the GFCC for formal approval shall be based on consensus. 6. Final decision After the consultation period, the working group(s) elaborate a final draft based on the comments from the consultations. This draft is presented to the GFCC for approval (according to § 6 Nr. 2f of the statutes)”
	Process	YES	#60_201124 GFCC Meeting 24 November 2020 (translated by Google Translate) “After Dirk Teegelbekkers presented the changes, which had been passed by the "Standard Revision" working group on October 27/28, 2020 in Göttingen where consensus was reached, the GFCC only makes an editorial change (reformulation of points 3.2 and 4.2 in PEFC D 1002-3).”
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	PEFC D 4001:2019 Version 2 “6. Final decision Within 14 days after formal approval of the documents, the secretariat shall correct all mistakes within the formally approved document and make the adopted documents, (...) available to the public on the website. 7. Documentation To ensure transparency and public availability, all drafts and the final documents adopted by the GFCC shall be published on the website of PEFC Germany within 14 days after formal approval.
	Process	YES	<i>The approved standard was published on the PEFC Germany website (pefc.de) on 24 November 2020, (which is the same day of the approval of the standard) and is freely accessible.</i>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
7.2.2 Standard(s) shall include:			
(a) identification and contact information for the standardising body,	Procedures	NO	Explanation provided by PEFC Germany “this is common practice since 20 years.” <i>No reference is found in the standard-setting procedures that the standard shall include identification and contact information for the standardising body. Although this might go well in practice, it shall be regulated in the procedures.</i>
	Process	YES	PEFC D 1002-1:2020 V2 and PEFC D 1002-2:2020 “PEFC Deutschland e.V. Tübinger Str. 15, D-70178 Stuttgart Tel: +49 (0)711 24 840 06, Fax: +49 (0)711 24 840 31 E-mail: info@pefc.de, Web: www.pefc.de ”
(b) official language of the standard,	Procedures	YES	PEFC D 4001:2019 Version 2 “All documents are written in German and translated into English for the purpose of recognition by the PEFC Council. In case of discrepancies between the German and English versions, the English version shall prevail.”
	Process	YES	PEFC D 1002-1:2020 V2 and PEFC D 1002-2:2020 “The only official version of the document is German.”
(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	PEFC D 4001:2019 Version 2 “All documents are written in German and translated into English for the purpose of recognition by the PEFC Council. In case of discrepancies between the German and English versions, the English version shall prevail.”
	Process	NO	PEFC D 4001:2019 Version 2 “All documents are written in German and translated into English for the purpose of recognition by the PEFC Council. In case of discrepancies between the German and English versions, the English version shall prevail.” PEFC D 1002-1:2020 V2 and PEFC D 1002-2:2020 “In case of any doubt the German version is decisive.”



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<i>The procedures (PEFC D 4001) comply with benchmark intention, however this is not reflected on the standards (PEFC D 1002-1:2020 V2 and PEFC D 1002-2:2020). The indication on the standards are in conflict with the procedures, it is therefore insufficiently ensured that the requirement is met.</i>
(d) The approval date and the date of next periodic review ¹⁶	Procedures	YES	PEFC D 4001:2019 Version 2 “6. Final decision Within 14 days after formal approval of the documents, the secretariat shall correct all mistakes within the formally approved document and make the adopted documents, which shall include the date of adoption and the date of the next periodic review, available to the public on the website.”
	Process	NO	PEFC D 1002-1:2020 V2 “Approved by: German Forest Certification Council Date: 24.11.2020” <i>On the approved version of the SFM standard no reference is found of the date of the next periodic review.</i>
7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any)	Procedures	NO	Explanation provided by PEFC Germany “The copies are publicly available (https://pefc.de/media/filer_public/cf/02/cf023700-11de-47e5-88e8-224cd390070e/pefc-standards_grafikversion_online_stand082021.pdf) and can be printed for free. Printed copies are send out for free, too, upon request.” <i>No reference is found in the standard-setting procedures that printed copies shall be made available upon request at a price that covers no more than administrative costs. Although this might go well in practice, it shall be regulated in the procedures.</i>
	Process	YES	<i>Evidence is found on the PEFC Germany website (https://pefc.de/neuigkeiten/pefc-waldstandard-ab-sofort-als-gedruckte-ausgabe-bestellbar) that the PEFC Germany forest standard is available to order in printed form free of charge.</i>
7.2.4 The standardising body shall make the	Procedures	YES	PEFC D 4001:2019 Version 2 “6. Final decision

¹⁶ NOTE The date of next periodic review may be within a shorter period than five years based on (for example) stakeholder expectations or other foreseen developments.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
development report (refer to PEFC GD 1007) publicly available			(...) Within 14 days after formal approval of the documents, the secretariat shall correct all mistakes within the formally approved document and make the adopted documents, which shall include the date of adoption and the date of the next periodic review, available to the public on the website”
	Process	YES	#62_201221 Public announcement on PEFC Germany website, 21 December 2020 (translated with Google Translate) “PEFC Germany has now published the report on the standard revision, which documents the process of the revision process in detail. You can call up the report here (with Annex 1 list of WG members and Annex 2 feedback on input during the consultation).”
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	PEFC D 4001:2019 Version 2 “1. Objectives This document specifies the procedure for the revision of the normative documents and of the forms and tools within the German PEFC scheme. It must be undertaken every five years 2.2 (...) Between two standard revisions, the PEFC secretariat collects feedback on the standards via a corresponding website, which will be presented to the working groups at their first meeting. 3. Preparation of the revision process 3.1 Announcement The process shall be started before the five-year-period after the last endorsement of the German PEFC scheme by PEFC International ends to allow sufficient time for the standard setting and endorsement process. 3.2 Comments At the beginning of the revision process, the records of the feedback (see chapter 2.2) are evaluated and a gap analysis is made so that these can be taken into account by the relevant working group.”
	Process	YES	Explanation provided by PEFC Germany “Feedback was collected before the revision process started and considered accordingly.” <i>The previous version of the SFM standard was approved on 26 November 2014. The current revision process started with an announcement on 14 August 2019, which is less than five years after approval.</i>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
			<i>No review was conducted, a normal revision was aimed for, the requirements for a gap analysis and stakeholder consultation are therefore not applicable.</i>
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 clear directions for providing feedback. ¹⁷	Procedures	YES	PEFC D 4001:2019 Version 2 “2.2 (...) Between two standard revisions, the PEFC secretariat collects feedback on the standards via a corresponding website”
	Process	NO	<i>The staff list of PEFC Germany is found on the website of PEFC Germany with field of expertise and contact details per person. However, no mechanism or description and clear directions are found for collecting and recording feedback on a standard.</i>
8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.	Procedures	YES	PEFC D 4001:2019 Version 2 “3.2 Comments At the beginning of the revision process, the records of the feedback (see chapter 2.2) are evaluated and a gap analysis is made so that these can be taken into account by the relevant working group. 7. Documentation With respect to the endorsement process by the PEFC Council International the following documents shall be collected and kept for at least five years: g) Documentation of the comments or complaints received.”
	Process	N.A.	<i>According to PEFC Germany, no feedback has been received apart from the standard revision process.</i>
	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review.</i>

¹⁷ NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
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.	Process	N.A.	<i>No review of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review.</i>
	Process	N.A.	<i>No review of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
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	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review.</i>
	Process	N.A.	<i>No review of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
in the stakeholder consultation.			
8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review.</i>
	Process	N.A.	<i>No review of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
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	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review.</i>
	Process	N.A.	<i>No review of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
(b) stakeholder meetings.	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review.</i>
	Process	N.A.	<i>No review of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review.</i>
	Process	N.A.	<i>No review of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review. Furthermore, it does not include options for reaffirmation of a standard.</i>
	Process	N.A.	<i>No review (or reaffirmation) of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.			
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	N.A.	<i>The German PEFC Scheme always requires a normal revision, and therefore does not need a review. Furthermore, it does not include options for reaffirmation of a standard.</i>
	Process	N.A.	<i>No review (or reaffirmation) of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
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	N.A.	<i>The German PEFC Scheme always requires a normal revision, and does not include options for reaffirmation of a standard.</i>
	Process	N.A.	<i>No reaffirmation of the standard was conducted, under the German PEFC Scheme only normal revisions of the standards are possible.</i>
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	N.A.	<i>The German PEFC Scheme always requires a normal revision.</i>
	Process	N.A.	<i>Under the German PEFC Scheme only normal revisions of the standards are possible. Editorial revisions are not an option. A normal revision was conducted.</i>
Revision of standards			
9.1 Procedures for revision of	Procedures	YES	PEFC D 4001:2019 Version 2 “1. Objectives



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
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.			<p>This document specifies the procedure for the revision of the normative documents and of the forms and tools within the German PEFC scheme. It must be undertaken every five years with the purpose to ensure objectivity, efficiency, transparency and consensus among the participating stakeholders.</p> <p>For the development of new standards and for time-critical revisions, i. e. revisions between two periodic reviews in a fast-track procedure, the requirements described in Annex 1 also apply.</p> <p>For standard setting, PEFC Germany promotes the participation of a wide spectrum of stakeholders. The procedure shall be open and transparent and lead to consensus among all participants.”</p> <p><i>Under the German PEFC Scheme only normal revisions of the standards are possible. Editorial revisions and time-critical revisions are not an option.</i></p>
	Process	YES	<i>The review process was a normal revision and did not include editorial revisions nor time-critical revisions. The revision followed the procedures set in PEFC D 4001:2019. Where these procedures do not fully conform with the requirements of PEFC ST 1001:2017, this is indicated under the specific requirement.</i>
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	N.A.	<i>The German PEFC Scheme always requires a normal revision and does not include requirements for an editorial revision.</i>
	Process	N.A.	<i>No editorial revision was conducted, instead, a normal revision was conducted.</i>
9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.	Procedures	YES	<p>PEFC D 4001:2019 Version 2</p> <p>“1. (...) For the development of new standards and for time-critical revisions, i. e. revisions between two periodic reviews in a fast-track procedure, the requirements described in Annex 1 also apply.”</p>
	Process	N.A.	<i>No time-critical revision was conducted, instead, a full revision was conducted.</i>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
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	PEFC D 4001:2019 Version 2 Annex I “2. A time-critical revision can only be carried out in the following cases: a) Change in national laws and regulations affecting compliance with PEFC International requirements.”
	Process	N.A.	<i>No time-critical revision was conducted, instead, a normal revision was conducted.</i>
(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	PEFC D 4001:2019 Version 2 Annex I “b) Requirement by PEFC International to comply with specific or new PEFC requirements within a time period that is too short for a normal audit.”
	Process	N.A.	<i>No time-critical revision was conducted, instead, a normal revision was conducted.</i>
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	YES	PEFC D 4001:2019 Version 2 Annex I “2. The time-critical revision is to be carried out in the following steps: a) The German Forest Certification Council drafts the revised standard.”
	Process	N.A.	<i>No time-critical revision was conducted, instead, a normal revision was conducted.</i>
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	YES	PEFC D 4001:2019 Version 2 Annex I “b) The German Forest Certification Council may consult the interested stakeholders, but this is not mandatory.”
	Process	N.A.	<i>No time-critical revision was conducted, instead, a normal revision was conducted.</i>
(c) The revised standard shall be approved formally at the highest appropriate decision-	Procedures	YES	PEFC D 4001:2019 Version 2 Annex I “c) The revised standard is formally adopted by the German Forest Certification Council.”
	Process	N.A.	<i>No time-critical revision was conducted, instead, a normal revision was conducted.</i>



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
making level of the standardising body,			
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	YES	PEFC D 4001:2019 Version 2 Annex I “d) The German Forest Certification Council shall explain the reasons for the urgent change(s) and make the justification publicly available.”
	Process	N.A.	<i>No time-critical revision was conducted, instead, a normal revision was conducted.</i>
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	YES	PEFC D 4001: 2019 “8. Revision The revised documents shall specify the date of validity and transition periods.”
	Process	YES	PEFC D 1002-1:2020 V2 “Published on: 01.12.2020 Entry into force: 01.01.2021 Transition period: 31.12.2021” PEFC D 1002-2:2020 “Published on: 13.12.2017 Entry into force: 01.01.2018” <i>For PEFC D 1002-2:2020 no transition period is found. It is therefore concluded that there is no transition period for PEFC D 1002-2:2020.</i>
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),	Procedures	YES	PEFC D 4001: 2019 “8. Revision (...) The date of validity shall not be set later than one year after the publication of the new standards. This period offers the time to implement the changes, disseminate information and carry out trainings.”
	Process	YES	PEFC D 1002-1:2020 V2 “Published on: 01.12.2020 Entry into force: 01.01.2021 PEFC D 1002-2:2020



PEFC benchmark requirement	Assess. basis*	YES /NO	Reference to system documentation (including quotation of relevant text)
introduction of change(s), information dissemination and training.			“Published on: 13.12.2017 Entry into force: 01.01.2018”
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	PEFC D 4001: 2019 “8. Revision (...) The transition period shall not exceed one year. Exceptions are acceptable under justified, exceptional circumstances, when the implementation of the revised standards requires more time.”
	Process	YES	PEFC D 1002-1:2020 V2 “Published on: 01.12.2020 Entry into force: 01.01.2021 Transition period: 31.12.2021” PEFC D 1002-2:2020 “Published on: 13.12.2017 Entry into force: 01.01.2018” <i>For PEFC D 1002-2:2020 no transition period is found. It is therefore concluded that there is no transition period for PEFC D 1002-2:2020.</i>



Part II: PEFC Checklist for Group Forest Management Certification

1 Scope

Part II covers requirements for sustainable forest management as defined in PEFC ST 1002:2018, Group Forest Management Certification – Requirements.

2 Checklist

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	YES	PEFC D 1001:2020 V3 “4.1 The regional organisation represented by the regional working group shall be created for an individual state of the Federal Republic of Germany. Any geographical overlap with another regional organisation shall be precluded. The regional organisation shall ensure access of participants on a non-discriminatory and voluntary basis.”
b) other groups and/or	N.A.	<i>The German PEFC Scheme only allows regional groups.</i>
c) whether there are any other specific circumstances which influence the implementation of the group management system.	N.A.	<i>The German PEFC Scheme only allows regional groups.</i>
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	PEFC D 1001:2020 V3 “5.1.2 The regional working group shall establish a body with overall responsibility for the regional working group. This body shall include representatives of different forest ownerships and structures of the region and shall provide for an appropriate access of other relevant stakeholders.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities”</p> <p>Explanation provided by PEFC Germany</p> <p>“As there are no indigenous people in Germany the term “affected stakeholders” is identical with the term “representatives of different forest ownerships and structures”. These shall not only be proactively identified but “included”. ”</p> <p><i>Based on 7.1.1.5 it can be assumed that the regional working group will identify affected stakeholders relevant for the group management system.</i></p>
b) the relevant expectations of these affected stakeholders.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities concerning:</p> <p>a) state of the forests, typical forest management practices within the region and their effect on sustainable forest management;</p> <p>b) the objectives and the action programme;</p> <p>c) requirements for sustainable forest management defined in PEFC D 1002-1;</p> <p>d) role and delivery of the regional certification.”</p>
4.3 Determining the scope of the group management system		
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>PEFC D 1001:2020 V3</p> <p>“3.2 Regional working group</p> <p>An entity that represents the participants, with overall responsibility for ensuring the conformity of forest management in the certified area to the sustainable forest management standard and other applicable requirements of the forest certification scheme.</p> <p>3.5 Regional organisation</p> <p>A group of participants within a specified geographical area represented by a regional working group for the purposes of implementation of the sustainable forest management standard and its certification.</p> <p>3.6 Participant</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		A forest owner/ manager or other entity covered by the regional forest certificate, who has the legal right to manage the forest in a clearly defined forest area and the ability to implement the requirements of the sustainable forest management standard in that area. The term “participant” also includes forestry unions representing their members in a regional certification.”
b) the certified area,	YES	PEFC D 1001:2020 V3 “3.1 Certified area The forest area of the participant covered by a regional forest certificate”
c) the group certificate and	YES	PEFC D 1001:2020 V3 “3.3 Regional forest certificate A document confirming that the regional organisation complies with the requirements of the sustainable forest management standard and other applicable requirements of the forest certification scheme.”
d) the document confirming participation in group certification.	YES	PEFC D 1001:2020 V3 “3.7 Confirmation of participation in regional organisation A document issued to an individual participant that refers to the regional forest certificate and that confirms the participant as being covered by the scope of the regional forest certification.”
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	PEFC D 1001:2020 V3 “4.1 The regional organisation represented by the regional working group shall be created for an individual state of the Federal Republic of Germany. Any geographical overlap with another regional organisation shall be precluded. The regional organisation shall ensure access of participants on a non-discriminatory and voluntary basis. 4.2 The regional organisation has an overall responsibility for the implementation of the requirements of this document and participant’s compliance with the requirements for sustainable forest management as defined in PEFC D 1002-1. 7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <ul style="list-style-type: none"> a) cover the indicators for sustainable forest management defined in annex 1; b) provide an overview of the legislation in the region/province that is relevant to sustainable forest management; (...) c) provide information on the state of forests of the entire region; d) identify areas for improvement of the sustainable forest management within the region; e) be based on information and data from forest inventories and other data sources. The preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (...) and shall be completed within one year after the publication of the results of the same. <p>7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region (...).</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification.”</p> <p><i>Annex 1 of PEFC D 1001:2020 contains a list of indicators, with reference to (amongst others) specific clauses in the SFM standard.</i></p>
4.3.4 The standard requires that the scope shall be made available as documented information.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.”</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	PEFC D 1001:2020 V3 “7.1.2.2.1 The regional working group shall establish an internal monitoring programme covering all participants in the regional organisation that shall cover: c) an internal audit programme.”
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	PEFC D 1001:2020 V3 “4.8 Forest owners associations that do not market in the name and on behalf of the member participating in PEFC certification need a chain of custody certificate themselves if they want to sell their timber as PEFC certified.”
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	PEFC D 1001:2020 V3 “7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.”
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	PEFC D 1001:2020 V3 “4.3 The regional working group shall take joint responsibility for the communication and relationship with the certification body and the submission of an application for certification. The working group is the holder of the regional certificate.”
c) to establish written procedures for the management of the group organisation;	YES	PEFC D 1001:2020 V3 “7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification”
d) to establish written procedures for the acceptance of new participants of the group	YES	PEFC D 1001:2020 V3



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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)		<p>“6.1.1 The regional working group shall perform the following tasks to ensure participation of the participants in the regional certification:</p> <p>b) to receive, evaluate and register the self-commitments received from the potential participants;</p> <p>7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>b) participation in the regional certification, including acceptance, suspension and termination of the participation;”</p> <p><i>Contact details and identification & size of forest property are covered in the self-commitment document in Annex 2.</i></p>
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	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>b) participation in the regional certification, including acceptance, suspension and termination of the participation;</p> <p>Annex 2</p> <p>I certify that I have not been excluded from any certification scheme to date.”</p>
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	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <p>a) the participants, including their contact details, respective forest area; self-commitments received and the confirmations issued;</p> <p>b) total forest area (certified area) of the region;</p> <p>c) records relating to the objectives and action programme, its implementation, monitoring and review;</p> <p>d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;</p> <p>e) the complaints and appeals mechanism.”</p> <p><i>Identification & size of forest property are covered in the self-commitment document, as presented in Annex 2.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>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 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>	YES	<p>PEFC D 1001:2020 V3</p> <p>"4.4 The participation in the regional organisation is based on a written agreement between the regional working group and the participant represented by a written commitment of the participant and a written confirmation on participation in the regional certification issued by the regional working group.</p> <p>7.2 Responsibilities of the participants</p> <p>The participant in the regional certification shall:</p> <p>a) be committed to comply with the requirements for the regional certification (annex 2);</p> <p>b) comply with applicable requirements for the regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1); requirements for the PEFC Logo usage (PEFC ST 2001) and other measures identified in the action programme applicable to the participant;</p> <p>c) provide full co-operation and assistance in responding effectively to all requests from the regional working group or a certification body for relevant data, documentation or other information; allowing access to his forests and other facilities, whether in connection with internal and external audits, or reviews, or otherwise;</p> <p>d) implement relevant corrective and preventive actions established by the regional working group;</p> <p>Annex 2: Self-commitments</p> <p>(...) In order to participate in the regional PEFC certification, (,,,) I will offer my full cooperation and support to the Regional Working Group (...) In addition, I will implement measures under the Regional Action Programme relevant to participants in the Regional Certification; the same applies to relevant corrective and preventive measures imposed by the Regional Working Group."</p> <p>PEFC D 1002-1:2020 V2</p> <p>"Responsibilities of the participants</p> <p>Forest owners participating in PEFC certification shall, in addition to the requirements defined in this document, fulfil the requirements for participants in regional certification according to PEFC D 1001, in particular:</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>b) implement relevant corrective and preventive actions established by the regional working group and other measures in the scope of the action programmes, which are relevant for the participant;”</p> <p><i>Although it is not explicitly specified that the group entity has the right to exclude any participant from the scope of certification in the event of nonconformity, the clauses ensure full cooperation of participants, which implicitly ensures that if no full cooperation is provided in the case of a nonconformity, the participant is breaching the written agreement and can be excluded.</i></p>
h) to provide all participants with a document confirming participation in the group forest certification;	YES	<p>PEFC D 1001:2020 V3</p> <p>“6.3.1 The confirmation of participation in the regional certification (the confirmation) shall be issued to the participant after the issuance of the regional certificate to the regional working group.”</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>PEFC D 1001:2020 V3</p> <p>“7.1.2.1.1 The regional working group shall provide the participants with detailed information, appropriate guidance and technical assistance, as appropriate, relating to:</p> <ul style="list-style-type: none"> a) requirements for the regional certification (PEFC D 1001); b) requirements for the sustainable forest management (PEFC D 1002-1) and their implementation; c) PEFC Logo usage rules (PEFC ST 2001); d) the objectives and the action programme, in particular those measures directly affecting the participants; e) Summary results of internal monitoring programme and respective preventive measures.”
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>PEFC D 1001:2020 V3</p> <p>“7.1.2.2.2 The regional working group shall evaluate information from external parties, such as governmental bodies, forestry associations, research institutions, non-governmental organisations that are relating to the participants’ compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage. The results of this evaluation shall be considered within the internal audit programme.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.2.2.1 The regional working group shall establish an internal monitoring programme covering all participants in the regional organisation that shall cover:</p> <ul style="list-style-type: none"> a) an evaluation of the participants' self-commitment; b) an evaluation of information from external parties; c) an internal audit programme. <p>7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p> <ul style="list-style-type: none"> a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001 and c) evaluating the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage.”
l) to operate an annual internal audit programme covering both group members and group entity;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme</p> <p>7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p> <ul style="list-style-type: none"> a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001 <p>7.1.2.2.4 In formulating the internal audit programme, the regional working group shall</p> <ul style="list-style-type: none"> a) take into account the results of previous audits, b) define the audit criteria and the scope of the audit, c) select the internal auditors and conduct the audits in such a way as to ensure the objectivity and impartiality of the process, d) present the audit results at a committee meeting,



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		e) keep records as evidence of the implementation of the audit programme and audit results. The sampling method is described in detail in Annex 4.”
m) to operate a management review of the group forest certification and acting on the results from the review;	YES	PEFC D 1001:2020 V3 “7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification (...) This monitoring and assessment shall be carried out by the regional working group at least annually and shall result in: a) measures relating to the overall compliance of participants with the requirements for sustainable forest management (PEFC D 1001), b) an update and redefinition of the objectives and the action programme, where appropriate. 7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme and assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants’ level) and preventive (in case of systematic non-conformities) measures shall be implemented.”
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	PEFC D 1001:2020 V3 “4.3 The regional working group shall take joint responsibility for the communication and relationship with the certification body and the submission of an application for certification. The working group is the holder of the regional certificate. 5.1.4 The regional working group shall a) ensure full cooperation and assistance in responding to any request from the certification body, the accreditation body, PEFC Germany or PEFC International for relevant data, documentation or other information. b) ensure access to all relevant facilities in connection with formal audits or reviews. 5.3.1 The PEFC Germany secretariat can provide based on a written contract, the regional working group with the following administrative services: a) Registration of the participants, b) Printing and distribution of the confirmations of participation, c) Distribution and dissemination of the scheme documentation and its changes, and other information and documentation of the regional organisation,



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		d) Other administrative tasks of the regional working group specified in the contract with the regional working group.”
5.1.2 Function and responsibilities of participants The standard requires that the following functions and responsibilities of the participants shall be specified:		
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. 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.	YES	PEFC D 1001:2020 V3 “6.2.1 The potential participant covered by 5.2.1 a, b, shall submit to the regional working group the self-commitment specified in annex 2, Part I. 6.2.2 The forestry association covered by 5.2.1c shall submit on behalf of its members to the regional working group a collective self-commitment specified in annex 2, Part II. The commitment shall be made based on the majority decision of the association’s decision making body. 6.2.3 The forestry association acting as an intermediary body covered by 5.2.1d shall submit on behalf of its members willing to participate in the regional certification to the regional working group a collective self-commitment specified in annex 2, Part III 6.2.4 In case, participation has been terminated because of non-conformities against the requirements for regional certification (see 6.3.5), the re-application for participation can be submitted at the earliest 12 months after exclusion. The application shall include the self-commitment and a confirmation of a certification body that the non-conformity(ies) have been corrected successfully. Annex 2: Self-commitments <i>(Part I)</i> By signing this document, I undertake to comply with the PEFC Standards for Sustainable Forest Management (PEFC D 1002-1) (...) In order to participate in the regional PEFC certification, I will fulfil the relevant requirements from PEFC D 1001. (...)The PEFC Logo is used exclusively in accordance with the PEFC D ST 2001 Trademark Standard and on the basis of a Logo Usage Agreement with PEFC Deutschland e.V.. <i>(Part II)</i> The above-mentioned forestry association wants to give its members the opportunity to participate in the regional PEFC certification. On behalf of all my members, I assure that all their



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>forests are managed according to the PEFC standards for sustainable forest management (PEFC D 1002-1, see www.pefc.de). The forestry association wishes to participate in the PEFC certification scheme in its entirety and declares its commitment to this.</p> <p>By signing this document, I undertake to comply with the requirements for regional forest certification from PEFC D 1001.</p> <p><i>(Part III)</i></p> <p>The above forestry association wants to give its members the opportunity to participate in the regional PEFC certification. The forestry association wants to participate in the PEFC certification system in the function of an intermediate body and commits itself to this. The participating members undertake to manage their forest property in accordance with the PEFC standards for sustainable forest management (PEFC D 1002-1, (...)) and to fulfil the requirements for regional forest certification from PEFC D 1001.”</p>
b) To provide the group entity with information about previous group participation.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.2 (...) The participant in the regional certification shall:</p> <p>e) inform the regional working group about previous participations in a regional certification”</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;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.2 The participant in the regional certification shall:</p> <p>b) comply with applicable requirements for the regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1); requirements for the PEFC Logo usage (PEFC ST 2001) and other measures identified in the action programme applicable to the participant;”</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 related or with implications for the management system;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.2 The participant in the regional certification shall:</p> <p>c) provide full co-operation and assistance in responding effectively to all requests from the regional working group or a certification body for relevant data, documentation or other information; allowing access to his forests and other facilities, whether in connection with internal and external audits, or reviews, or otherwise;”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification.	YES	PEFC D 1001:2020 V3 "7.2 (...) The participant in the regional certification shall: e) inform the regional working group about (...) non-conformities found in the context of other regional certifications,"
f) to implement relevant corrective and preventive actions established by the group entity.	YES	PEFC D 1001:2020 V3 "7.2 The participant in the regional certification shall: d) implement relevant corrective and preventive actions established by the regional working group;"
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	PEFC D 1001:2020 V3 "7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region."
b) to integrate the group certification requirements in the group management system;	YES	PEFC D 1001:2020 V3 "7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region."
c) to continuously improve the group management system;	YES	PEFC D 1001:2020 V3 "7.1.1.1 The regional working group shall make a public commitment (...) to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region."



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	YES	PEFC D 1001:2020 V3 “7.1.1.1 The regional working group shall make a public commitment (...) to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region. 7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region to ensure that: a) the objectives are operational, measurable and achievable within a specific timeframe; b) the action programme provides for specific measures, including responsibilities and dates of their completion.”
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	PEFC D 1001:2020 V3 “7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.”
5.2.3 The standard requires that the participants shall provide a commitment		
a) to follow the rules of the management system;	YES	PEFC D 1001:2020 V3 “Annex 2 I will fulfil the relevant requirements from PEFC D 1001. In particular, I will offer my full cooperation and support to the Regional Working Group”
b) to implement the requirements of the sustainability standard in their operations in their area.	YES	PEFC D 1001:2020 V3 “Annex 2 By signing this document, I undertake to comply with the PEFC Standards for Sustainable Forest Management (PEFC D 1002-1)”
6. Planning		
6.1 The standard requires that if a group organisation plans any changes in the group	YES	PEFC D 1001:2020 V3



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
management system, these changes shall be included in a group management plan.		<p>“7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification (...) This monitoring and assessment shall be carried out by the regional working group at least annually and shall result in:</p> <p>b) an update and redefinition of the objectives and the action programme, where appropriate.”</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 requirements shall be considered in a group management plan.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;</p> <p>b) provide an overview of the legislation in the region/province that is relevant to sustainable forest management; (...)</p> <p>c) provide information on the state of forests of the entire region;</p> <p>d) identify areas for improvement of the sustainable forest management within the region;</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification (...) This monitoring and assessment shall be carried out by the regional working group at least annually and shall result in:</p> <p>b) an update and redefinition of the objectives and the action programme, where appropriate .”</p>
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	<p>PEFC D 1001:2020 V3</p> <p>“5.1.3 The regional working group shall ensure that (...) the necessary resources are identified and allocated for the establishment, implementation, maintenance, and continuous improvement of the regional processes.</p> <p>7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme and assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants’ level) and preventive (in case of systematic non-conformities) measures shall be implemented covering the following elements:</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		a) description of measures to be implemented; b) responsibility for their implementation; c) timetable for their implementation; d) means for the evaluation of their implementation (e.g. follow-up audit, evidence submitted by the participant, etc.).”
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	YES	PEFC D 1001:2020 V3 “7.1.2.2.6 The regional working group shall ensure that the personnel performing the internal audits are competent based on the following criteria: a) university education in the field of forestry; b) minimum two years full-time working experience in forestry; c) knowledge about the requirements of the German PEFC scheme and about audit procedures.” Explanation provided by PEFC Germany “The internal auditors (called “regional assistants”) are the only personnel working for the regional working group. The competence of them is ensured by the requirement quoted above. All other persons in the working group (chair, board, members) act on a honorary basis”
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	PEFC D 1001:2020 V3 “7.1.2.1.1 The regional working group shall provide the participants with detailed information, appropriate guidance and technical assistance, as appropriate, relating to: e) the objectives and the action programme, in particular those measures directly affecting the participants; 7.1.2.1.2 Forestry associations participating in the regional certification under 5.2.1c and d shall distribute the information and provide the guidance according to 7.1.2.1.1 to their (participating) members.”
b) the requirements of the sustainable forest management standard;	YES	PEFC D 1001:2020 V3 “7.1.2.1.1 The regional working group shall provide the participants with detailed information, appropriate guidance and technical assistance, as appropriate, relating to:



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) requirements for the regional certification (PEFC D 1001);</p> <p>b) requirements for the sustainable forest management (PEFC D 1002-1) and their implementation;</p> <p>7.1.2.1.2 Forestry associations participating in the regional certification under 5.2.1c and d shall distribute the information and provide the guidance according to 7.1.2.1.1 to their (participating) members.”</p>
c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.2.1.1. The regional working group shall provide the participants with detailed information, appropriate guidance and technical assistance, as appropriate, relating to:</p> <p>a) requirements for the regional certification (PEFC D 1001);</p> <p>b) requirements for the sustainable forest management (PEFC D 1002-1) and their implementation;</p> <p>d) the objectives and the action programme, in particular those measures directly affecting the participants;</p> <p>e) Summary results of internal monitoring programme and respective preventive measures.</p> <p>7.1.2.1.2 Forestry associations participating in the regional certification under 5.2.1c and d shall distribute the information and provide the guidance according to 7.1.2.1.1 to their (participating) members.”</p>
d) the implications of not conforming with the group management system requirements.	YES	<p>PEFC D 1001:2020 V3</p> <p>“5.2.2 The participation of the forest owners through a forestry association basically covers all members of the association. The association shall demonstrate that it has in place a system ensuring its members’ compliance with the certification requirements, in particular it shall:</p> <p>d) define, assign and document responsibilities and procedures ensuring compliance of its members with the certification requirements (PEFC D 1001 und PEFC D 1002-1) and communicate them to its members;</p> <p>7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>b) participation in the regional certification, including acceptance, suspension and termination of the participation;</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>7.1.2.1.1 The regional working group shall provide the participants with detailed information, appropriate guidance and technical assistance, as appropriate, relating to:</p> <p>d) the objectives and the action programme, in particular those measures directly affecting the participants;</p> <p>e) Summary results of internal monitoring programme and respective preventive measures.</p> <p>7.1.2.1.2 Forestry associations participating in the regional certification under 5.2.1c and d shall distribute the information and provide the guidance according to 7.1.2.1.1 to their (participating) members.”</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>PEFC D 1001:2020 V3</p> <p>“7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities concerning:</p> <p>a) state of the forests, typical forest management practices within the region and their effect on sustainable forest management;</p> <p>b) the objectives and the action programme;</p> <p>c) requirements for sustainable forest management defined in PEFC D 1002-1;</p> <p>d) role and delivery of the regional certification.”</p>
b) when to communicate;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities concerning:</p> <p>a) state of the forests, typical forest management practices within the region and their effect on sustainable forest management;</p> <p>b) the objectives and the action programme;</p> <p>c) requirements for sustainable forest management defined in PEFC D 1002-1;</p> <p>d) role and delivery of the regional certification.</p> <p>Both external and internal communication is carried out promptly for the given occasion and uses an appropriate medium in each case, e.g. announcements on the regional website, mailings or the dispatch of brochures.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
c) with whom to communicate;	YES	PEFC D 1001:2020 V3 “7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities”
d) how to communicate.	YES	PEFC D 1001:2020 V3 “7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities (...) Both external and internal communication is carried out promptly for the given occasion and uses an appropriate medium in each case, e.g. announcements on the regional website, mailings or the dispatch of brochures.”
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	PEFC D 1001:2020 V3 “7.1.1.6 The regional working group shall establish a complaints and appeal resolution mechanism dealing with complaints and appeals relating to the implementation of the requirements for the regional certification (PEFC D 1001) and for sustainable forest management (PEFC D 1002-1) that shall provide for: a) acknowledgement of the received complaint to the complainant; b) gathering and verification of all necessary information, validation and impartial evaluation of the complaint/appeal and decision making on the complaint/appeal; c) information to the complainant regarding the ongoing decision process; d) formal communication of the decision on the complaint/appeal and the complaint/appeal handling process to the complainant/appellant and concerned parties; e) appropriate corrective and preventive measures; f) an accessible contact point for the complaints and appeals.”
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	PEFC D 1001:2020 V3 “7.1.1.8 The regional working group shall keep up-to-date records that cover: a) the participants, including their contact details, respective forest area; self-commitments received and the confirmations issued;



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		b) total forest area (certified area) of the region; c) records relating to the objectives and action programme, its implementation, monitoring and review; d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures; e) the complaints and appeals mechanism."
b) available and suitable for use, where and when it is needed;	YES	PEFC D 1001:2020 V3 "7.1.1.8 The regional working group shall keep up-to-date records that cover: a) the participants, including their contact details, respective forest area; self-commitments received and the confirmations issued; b) total forest area (certified area) of the region; c) records relating to the objectives and action programme, its implementation, monitoring and review; d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures; e) the complaints and appeals mechanism. The records shall be available and suitable for use where and when needed and adequately protected against loss of confidentiality, misuse or loss of integrity."
c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	YES	PEFC D 1001:2020 V3 "7.1.1.8 The regional working group shall keep up-to-date records that cover: a) the participants, including their contact details, respective forest area; self-commitments received and the confirmations issued; b) total forest area (certified area) of the region; c) records relating to the objectives and action programme, its implementation, monitoring and review; d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures; e) the complaints and appeals mechanism.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		The records shall be available and suitable for use where and when needed and adequately protected against loss of confidentiality, misuse or loss of integrity."
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>PEFC D 1001:2020 V3</p> <p>"7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.</p> <p>7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region.</p> <p>7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region.</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants' compliance with the requirements for the regional certification."</p>
b) to implement the actions determined in 6.	YES	<p>PEFC D 1001:2020 V3</p> <p>"7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region.</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants' compliance with the requirements for the regional certification using:</p> <p>a) results of the internal monitoring programme (ch. 7.1.2.2);</p> <p>b) information from parties responsible for the implementation of the specific measures of the action programme;</p> <p>c) information and data from other parties and external sources relevant to the objectives and the action programme.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>This monitoring and assessment shall be carried out by the regional working group at least annually and shall result in:</p> <p>a) measures relating to the overall compliance of participants with the requirements for sustainable forest management (PEFC D 1001),</p> <p>b) an update and redefinition of the objectives and the action programme, where appropriate.</p> <p>7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme and assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants' level) and preventive (in case of systematic non-conformities) measures shall be implemented covering the following elements:</p> <p>a) description of measures to be implemented;</p> <p>b) responsibility for their implementation;</p> <p>c) timetable for their implementation;</p> <p>d) means for the evaluation of their implementation (e.g. follow-up audit, evidence submitted by the participant, etc.).</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>PEFC D 1001:2020 V3</p> <p>"7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;</p> <p>c) provide information on the state of forests of the entire region;</p> <p>d) identify areas for improvement of the sustainable forest management within the region;</p> <p>e) be based on information and data from forest inventories and other data sources. The preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (Bundeswaldinventur) and shall be completed within one year after the publication of the results of the same.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region to ensure that: a) the objectives are operational, measurable and achievable within a specific timeframe; b) the action programme provides for specific measures, including responsibilities and dates of their completion.”
b) implementing control of the processes in accordance with the criteria;	YES	PEFC D 1001:2020 V3 7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification (...) This monitoring and assessment shall be carried out by the regional working group at least annually”
c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.	YES	PEFC D 1001:2020 V3 “7.1.1.8 The regional working group shall keep up-to-date records that cover: c) records relating to the objectives and action programme, its implementation, monitoring and review; d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;”
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	PEFC D 1001:2020 V3 “7.1.2.2.1 The regional working group shall establish an internal monitoring programme covering all participants in the regional organisation that shall cover: a) an evaluation of the participants’ self-commitment; b) an evaluation of information from external parties; c) an internal audit programme. 7.1.2.2.3 (...) annual internal audit programme to



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants,</p> <p>b) the conformity of the regional processes with the requirements of PEFC D 1001 and</p> <p>c) evaluating the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage."</p>
b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;	YES	<p>PEFC D 1001:2020 V3</p> <p>"7.1.2.2.2 The regional working group shall evaluate information from external parties, such as governmental bodies, forestry associations, research institutions, non-governmental organisations that are relating to the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage. The results of this evaluation shall be considered within the internal audit programme.</p> <p>7.1.2.2.5 Elements of an internal audit programme can be:</p> <p>a) evaluation through an individual internal monitoring/ revision or quality management system or controlling of the participant;</p> <p>b) evaluation carried out by independent third parties;</p> <p>c) evaluation as part of an inventory and planning process of the participating enterprise;</p> <p>d) evaluation carried out by forestry associations;</p> <p>e) internal audit implemented or commissioned by the regional working group itself, this also includes remote audits;</p> <p>any other independent evaluation regarding the compliance of the participants with the PEFC requirements."</p>
c) when the monitoring and measuring shall be performed;	YES	<p>PEFC D 1001:2020 V3</p> <p>"7.1.2.2.3 The regional working group shall establish an annual internal audit Programme (...)"</p>
d) when the results from monitoring and measurement shall be analysed and evaluated;	YES	<p>PEFC D 1001:2020 V3</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>“7.1.2.2.2 The regional working group shall evaluate information (...) relating to the participants’ compliance with the requirements (...). The results of this evaluation shall be considered within the internal audit programme.</p> <p>7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p> <ul style="list-style-type: none"> a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001 and c) evaluating the participants’ compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage.”
e) what documented information shall be available as evidence of the results.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <ul style="list-style-type: none"> d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;”
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>PEFC D 1001:2020 V3</p> <p>“7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme (...) using:</p> <ul style="list-style-type: none"> a) results of the internal monitoring programme (ch. 7.1.2.2); b) information from parties responsible for the implementation of the specific measures of the action programme; c) information and data from other parties and external sources relevant to the objectives and the action programme. <p>This monitoring and assessment shall be carried out by the regional working group at least annually and shall result in:</p> <ul style="list-style-type: none"> (...) b) an update and redefinition of the objectives and the action programme, where appropriate.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>7.1.2.2.2 The regional working group shall evaluate information (...) relating to the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage. The results of this evaluation shall be considered within the internal audit programme.</p> <p>7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p> <p>a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants,</p> <p>b) the conformity of the regional processes with the requirements of PEFC D 1001</p> <p>7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme and assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants' level) and preventive (in case of systematic non-conformities) measures shall be implemented."</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:		
a) conforms to	YES	PEFC D 1001:2020 V3
i. the group organisation's own requirements for its group management system;		"7.1.2.2.3 The regional working group shall establish an annual internal audit programme to
ii. the requirements of the national group certification standard;		a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants,
		b) the conformity of the regional processes with the requirements of PEFC D 1001
		and
		c) evaluating the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage.."
b) ensures the implementation of the sustainable forest management standard on the participant level;	YES	PEFC D 1001:2020 V3
		"7.1.2.2.3 The regional working group shall establish an annual internal audit programme to
		a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants,



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		b) the conformity of the regional processes with the requirements of PEFC D 1001 and c) evaluating the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage."
c) is effectively implemented and maintained.	YES	PEFC D 1001:2020 V3 "7.1.2.2.3 The regional working group shall establish an annual internal audit programme to a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001"
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	PEFC D 1001:2020 V3 "7.1.2.2.3 The regional working group shall establish an annual internal audit programme to a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001 7.1.2.2.4 In formulating the internal audit programme, the regional working group shall: b) define the audit criteria and the scope of the audit, The sampling method is described in detail in Annex 4."
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	PEFC D 1001:2020 V3 "7.1.2.2.3 The regional working group shall establish an annual internal audit programme to a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001 and c) evaluating the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage." 7.1.2.2.4 In formulating the internal audit programme, the regional working group shall



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) take into account the results of previous audits, b) define the audit criteria and the scope of the audit, c) select the internal auditors and conduct the audits in such a way as to ensure the objectivity and impartiality of the process, d) present the audit results at a committee meeting, e) keep records as evidence of the implementation of the audit programme and audit results. The sampling method is described in detail in Annex 4. 7.1.2.2.5 Elements of an internal audit programme can be: a) evaluation through an individual internal monitoring/ revision or quality management system or controlling of the participant; b) evaluation carried out by independent third parties; c) evaluation as part of an inventory and planning process of the participating enterprise; d) evaluation carried out by forestry associations; e) internal audit implemented or commissioned by the regional working group itself, this also includes remote audits; f) any other independent evaluation regarding the compliance of the participants with the PEFC requirements. 7.1.2.2.6 The regional working group shall ensure that the personnel performing the internal audits are competent Annex 4: Sampling procedure for the internal audit programme 2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample: b) Non-conformities and corrective actions identified as result of previous internal audits shall be taken into account.” <i>Additional procedures are elaborated in Annex 4 of PEFC D 1001:2020.</i></p>
b) definition of the audit criteria and scope for each audit;	YES	<p>PEFC D 1001:2020 V3 “7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		c) internal monitoring programme, including definition, implementation and monitoring of corrective and preventive measures;" <i>PEFC D 3004:2017 provides further guidance (non-normative) to options for the selection of audit criteria.</i>
c) competence of internal auditor (forest knowledge, standard knowledge);	YES	PEFC D 1001:2020 V3 "7.1.2.2.6 The regional working group shall ensure that the personnel performing the internal audits are competent based on the following criteria: a) university education in the field of forestry; b) minimum two years full-time working experience in forestry; c) knowledge about the requirements of the German PEFC scheme and about audit procedures."
d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;	YES	PEFC D 3004:2017 "4.3 The staff carrying out internal audits must be sufficiently qualified. The requirement profile is congruent with the profile defined in the advertisements for the positions of regional assistants:" PEFC D 1001:2020 V3 "7.1.2.2.4 In formulating the internal audit programme, the regional working group shall c) select the internal auditors and conduct the audits in such a way as to ensure the objectivity and impartiality of the process,"
e) ensuring that the results of the audits are reported to relevant group management;	YES	PEFC D 1001:2020 V3 "7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover: c) internal monitoring programme, including (...) monitoring of corrective and preventive measures" <i>As the regional working group is responsible for writing procedures for its management, including the internal monitoring programme, it is concluded that results of audits will automatically return to the group management.</i>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	YES	PEFC D 1001:2020 V3 “7.1.1.8 The regional working group shall keep up-to-date records that cover: d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;”
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	PEFC D 1001:2020 V3 “Annex 4 1. The sample size shall be the square root of the total number of participants ($y=\sqrt{x}$) multiplied by a factor of 0.6, rounded to the nearest integer.”
b) determination of sample categories(9.3.3);	YES	PEFC D 1001:2020 V3 “Annex 4 2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample: a) At least 25 % of the participants shall be randomly selected. b) Non-conformities and corrective actions identified as result of previous internal audits shall be taken into account. c) Participants not included in previous internal audits shall be selected preferentially to ensure the highest possible coverage. d) Complaints or information from third parties related to participants' compliance with certification requirements shall be taken into account. e) The sample shall include a proportion of participating forestry associations that is proportional to the proportion of the total certified forest area in the region that is covered by the forest area of these associations. f) The sample shall be representative of the forest area of the participants.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		g) The sample shall be representative with regard to the spatial distribution of the forest areas as well as to the type of forest ownership (federal, state, communal, private forest)."
c) distribution of the sample to the categories (9.3.4);	YES	<p>PEFC D 1001:2020 V3</p> <p>"Annex 4</p> <p>3. The random selection according to chapter 2. a) shall be proportional to the size of the forest area of the participants and shall be carried out according to the following method:</p> <p>a) Allocation of participants according to their forest areas to size classes 1 - 3 and preparation of a list of participants per size class.</p> <p>b) Calculation of the cumulative totals of the individual forest areas in each participant list.</p> <p>Generation of random numbers between zero and the total area in a size class."</p>
d) selection of the participants (9.3.5).	YES	<p>PEFC D 1001:2020 V3</p> <p>"Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>a) At least 25 % of the participants shall be randomly selected.</p> <p>b) Non-conformities and corrective actions identified as result of previous internal audits shall be taken into account.</p> <p>c) Participants not included in previous internal audits shall be selected preferentially to ensure the highest possible coverage.</p> <p>d) Complaints or information from third parties related to participants' compliance with certification requirements shall be taken into account.</p> <p>e) The sample shall include a proportion of participating forestry associations that is proportional to the proportion of the total certified forest area in the region that is covered by the forest area of these associations.</p> <p>f) The sample shall be representative of the forest area of the participants.</p> <p>g) The sample shall be representative with regard to the spatial distribution of the forest areas as well as to the type of forest ownership (federal, state, communal, private forest)."</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)						
9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level.	N.A.	<i>There are no additional requirements.</i>						
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.	YES	PEFC D 1001:2020 V3 "Annex 4 2. The sample shall include a proportion of participating forestry associations that is proportional to the proportion of the total certified forest area in the region that is covered by the forest area of these associations."						
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	PEFC D 1001:2020 V3 "Annex 4 1. The sample size shall be the square root of the total number of participants ($y=\sqrt{x}$) multiplied by a factor of 0.6, rounded to the nearest integer."						
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	PEFC D 1001:2020 V3 "Annex 4 1. The sample size shall be the square root of the total number of participants ($y=\sqrt{x}$) multiplied by a factor of 0.6, rounded to the nearest integer."						
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;	YES	PEFC D 1001:2020 V3 "Annex 4 4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators: <table border="1"> <tr> <td>Risk</td><td>Low</td><td>High</td></tr> <tr> <td>Results of previous internal audits.</td><td>No nonconformities</td><td>Several nonconformities</td></tr> </table>	Risk	Low	High	Results of previous internal audits.	No nonconformities	Several nonconformities
Risk	Low	High						
Results of previous internal audits.	No nonconformities	Several nonconformities						



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)		
		Quality / reliability of the internal monitoring programme, i.e. results of the risk analysis.	IMP reliable	IMP not reliable
		Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences
		Complaints received or relevant information from third parties.	None	Several
		Use of relevant information obtained through modern technologies (e.g. remote sensing).	Information utilized	Information not utilized
		Other measures taken to obtain relevant	Existent	Non-existent
		”		
b) results of internal audits or previous certification audits;	YES	PEFC D 1001:2020 V3 “Annex 4 4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:		
		Risk	Low	High
		Results of previous internal audits.	No nonconformities	Several nonconformities
”				
c) quality / level of confidence of the internal monitoring programme;	YES	PEFC D 1001:2020 V3 “Annex 4 4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:		
		Risk	Low	High
		Quality / reliability of the internal monitoring programme, i.e. results of the risk analysis.	IMP reliable	IMP not reliable
”				



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)						
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.	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:</p> <table border="1"> <tr> <td>Risk</td><td>Low</td><td>High</td></tr> <tr> <td>Use of relevant information obtained through modern technologies (e.g. remote sensing).</td><td>Information utilized</td><td>Information not utilized</td></tr> </table> <p>”</p>	Risk	Low	High	Use of relevant information obtained through modern technologies (e.g. remote sensing).	Information utilized	Information not utilized
Risk	Low	High						
Use of relevant information obtained through modern technologies (e.g. remote sensing).	Information utilized	Information not utilized						
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.	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:</p> <table border="1"> <tr> <td>Risk</td><td>Low</td><td>High</td></tr> <tr> <td>Other measures taken to obtain relevant information on activities on the site.</td><td>Existent</td><td>Non-existent</td></tr> </table> <p>”</p>	Risk	Low	High	Other measures taken to obtain relevant information on activities on the site.	Existent	Non-existent
Risk	Low	High						
Other measures taken to obtain relevant information on activities on the site.	Existent	Non-existent						
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);	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>g) (...) the type of forest ownership (federal, state, communal, private forest).”</p> <p><i>Although no specific reference is found to a risk assessment, the clauses in Annex 4 sufficiently ensure that risks shall be considered when selecting the samples.</i></p>						



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)						
b) size of management units (different size classes);	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>f) The sample shall be representative of the forest area of the participants.”</p>						
c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>g) The sample shall be representative with regard to the spatial distribution of the forest areas</p> <p>4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:</p> <table border="1"> <tr> <td>Risk</td><td>Low</td><td>High</td></tr> <tr> <td>Complexity and differences within the region, spatial distribution and natural environment.</td><td>Non-complex, few differences</td><td>Komplex and large differences</td></tr> </table> <p>”</p>	Risk	Low	High	Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences
Risk	Low	High						
Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences						
d) operations, processes and products of potential group participants;	N.A.	<i>Not included as a potential indicator in the risk assessment in the German PEFC Scheme.</i>						
e) deforestation and forest conversion;	N.A.	<i>Not included as a potential indicator in the risk assessment in the German PEFC Scheme.</i>						
f) rotation period(s);	N.A.	<i>Not included as a potential indicator in the risk assessment in the German PEFC Scheme.</i>						
g) richness of biological diversity;	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:</p> <table border="1"> <tr> <td>Risk</td><td>Low</td><td>High</td></tr> <tr> <td>Complexity and differences within the region, spatial distribution and natural environment.</td><td>Non-complex, few differences</td><td>Komplex and large differences</td></tr> </table>	Risk	Low	High	Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences
Risk	Low	High						
Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences						



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)												
		"												
h) recreation and other socio-economic functions of the forest;	N.A.	<i>Not included as a potential indicator in the risk assessment in the German PEFC Scheme.</i>												
i) dependence of and interaction with local communities and indigenous people;	N.A.	<i>Not included as a potential indicator in the risk assessment in the German PEFC Scheme.</i>												
j) available resources for administration, operations, training and research;	N.A.	<i>Not included as a potential indicator in the risk assessment in the German PEFC Scheme.</i>												
k) governance and law enforcement.	N.A.	<i>Not included as a potential indicator in the risk assessment in the German PEFC Scheme.</i>												
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.	NO	<p>PEFC D 1001:2020 V3</p> <p>"Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>f) The sample shall be representative of the forest area of the participants.</p> <p>g) The sample shall be representative with regard to the spatial distribution of the forest areas as well as to the type of forest ownership (federal, state, communal, private forest).</p> <p>3. The random selection according to chapter 2. a) shall be proportional to the size of the forest area of the participants</p> <p>4. The Regional Working Group may reduce or increase the sample size taking into account one or more of the following indicators:</p> <table border="1"> <tr> <th>Risk</th><th>Low</th><th>High</th></tr> <tr> <td>Results of previous internal audits.</td><td>No nonconformities</td><td>Several nonconformities</td></tr> <tr> <td>Quality / reliability of the internal monitoring programme, i.e. results of the risk analysis.</td><td>IMP reliable</td><td>IMP not reliable</td></tr> <tr> <td>Complexity and differences within the region, spatial distribution and natural environment.</td><td>Non-complex, few differences</td><td>Komplex and large differences</td></tr> </table>	Risk	Low	High	Results of previous internal audits.	No nonconformities	Several nonconformities	Quality / reliability of the internal monitoring programme, i.e. results of the risk analysis.	IMP reliable	IMP not reliable	Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences
Risk	Low	High												
Results of previous internal audits.	No nonconformities	Several nonconformities												
Quality / reliability of the internal monitoring programme, i.e. results of the risk analysis.	IMP reliable	IMP not reliable												
Complexity and differences within the region, spatial distribution and natural environment.	Non-complex, few differences	Komplex and large differences												



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)		
		Complaints received or relevant information from third parties.	None	Several
		Use of relevant information obtained through modern technologies (e.g. remote sensing).	Information utilized	Information not utilized
		Other measures taken to obtain relevant	Existent	Non-existent
		<p>”</p> <p><i>The risk analysis in clause 4 refers to changing the sample size (as required under 9.3.2.3) and does not directly define requirements for the determination of sample categories (as required under 9.3.3). Furthermore, the respective consequences for the sampling are not defined.</i></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>	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>a) At least 25 % of the participants shall be randomly selected.</p> <p>b) Non-conformities and corrective actions identified as result of previous internal audits shall be taken into account.</p> <p>c) Participants not included in previous internal audits shall be selected preferentially to ensure the highest possible coverage.</p> <p>d) Complaints or information from third parties related to participants' compliance with certification requirements shall be taken into account.</p> <p>e) The sample shall include a proportion of participating forestry associations that is proportional to the proportion of the total certified forest area in the region that is covered by the forest area of these associations.</p> <p>f) The sample shall be representative of the forest area of the participants.</p> <p>g) The sample shall be representative with regard to the spatial distribution of the forest areas as well as to the type of forest ownership (federal, state, communal, private forest).</p>		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>3. The random selection according to chapter 2. a) shall be proportional to the size of the forest area of the participants and shall be carried out according to the following method (see also PEFC D 1003-1, Annex 3):</p> <p>a) Allocation of participants according to their forest areas to size classes 1 - 3 and preparation of a list of participants per size class.</p> <p>b) Calculation of the cumulative totals of the individual forest areas in each participant list.</p> <p>c) Generation of random numbers between zero and the total area in a size class.</p> <p>d) Selection of a participant for the sample if the random number is equal to or less than the cumulative area total of that holding but greater than the cumulative area total of the preceding holdings.”</p> <p><i>Although not specifically mentioned, it is assumed that at maximum 75% of the participants is non-randomly selected based on (at least) requirements 2b, 2d, 2e, 2f, 2g, and the remaining minimum 25% of participants is randomly selected based on the requirements under 3. Distribution to the categories according to the result of the risk assessment is therefore sufficiently ensured.</i></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>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>a) At least 25 % of the participants shall be randomly selected.”</p>
9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.	YES	<p>PEFC D 1001:2020 V3</p> <p>“Annex 4</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <p>b) Non-conformities and corrective actions identified as result of previous internal audits shall be taken into account.</p> <p>c) Participants not included in previous internal audits shall be selected preferentially to ensure the highest possible coverage.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>d) Complaints or information from third parties related to participants' compliance with certification requirements shall be taken into account.</p> <p>e) The sample shall include a proportion of participating forestry associations that is proportional to the proportion of the total certified forest area in the region that is covered by the forest area of these associations.”</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>PEFC D 1001:2020 V3</p> <p>“7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region to ensure that:</p> <p>a) the objectives are operational, measurable and achievable within a specific timeframe;</p> <p>b) the action programme provides for specific measures, including responsibilities and dates of their completion.</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants' compliance with the requirements for the regional certification using:</p> <p>a) results of the internal monitoring programme (ch. 7.1.2.2);</p> <p>b) information from parties responsible for the implementation of the specific measures of the action programme;</p> <p>c) information and data from other parties and external sources relevant to the objectives and the action programme.</p> <p>This monitoring and assessment shall be carried out by the regional working group at least annually”</p> <p><i>Clause 7.1.1.4 refers to the action programme, which is the “action programme for the improvement of sustainable forest management for the entire region”.</i></p>
b) changes in external and internal issues that are relevant to the group management system;	YES	PEFC D 1001:2020 V3



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>“7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification using:</p> <p>a) results of the internal monitoring programme (ch. 7.1.2.2);</p> <p>b) information from parties responsible for the implementation of the specific measures of the action programme;</p> <p>c) information and data from other parties and external sources relevant to the objectives and the action programme.”</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>PEFC D 1001:2020 V3</p> <p>“7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification using:</p> <p>a) results of the internal monitoring programme (ch. 7.1.2.2);</p> <p>c) information and data from other parties and external sources relevant to the objectives and the action programme.”</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>PEFC D 1001:2020 V3</p> <p>“7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region to ensure that:</p> <p>a) the objectives are operational, measurable and achievable within a specific timeframe;</p> <p>b) the action programme provides for specific measures, including responsibilities and dates of their completion.</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification using:</p> <p>a) results of the internal monitoring programme (ch. 7.1.2.2);</p> <p>b) information from parties responsible for the implementation of the specific measures of the action programme;</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		c) information and data from other parties and external sources relevant to the objectives and the action programme.”
e) opportunities for continual improvement.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region</p> <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification</p> <p>(...) This monitoring and assessment shall be carried out by the regional working group at least annually and shall result in: (...)</p> <p>b) an update and redefinition of the objectives and the action programme, where appropriate.”</p>
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	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants’ compliance with the requirements for the regional certification using:</p> <p>a) results of the internal monitoring programme (ch. 7.1.2.2);</p> <p>b) information from parties responsible for the implementation of the specific measures of the action programme;</p> <p>c) information and data from other parties and external sources relevant to the objectives and the action programme.</p> <p>This monitoring and assessment shall be carried out by the regional working group at least annually and shall result in: (...)</p> <p>b) an update and redefinition of the objectives and the action programme, where appropriate.”</p>
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <p>c) records relating to the objectives and action programme, its implementation, monitoring and review;</p> <p>d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
10. Improvement		
10.1 Non conformity 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	PEFC D 1001:2020 V3 “7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover: c) internal monitoring programme, including definition, implementation and monitoring of corrective and preventive measures;”
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	PEFC D 1001:2020 V3 “7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover: c) internal monitoring programme, including definition, implementation and monitoring of corrective and preventive measures; 7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme and assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants’ level) and preventive (in case of systematic non-conformities) measures shall be implemented”
c) implement any action needed;	YES	PEFC D 1001:2020 V3 “7.2 The participant in the regional certification shall: d) implement relevant corrective and preventive actions established by the regional working group; 7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme and assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants’ level) and preventive (in case of systematic non-conformities) measures shall be implemented”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
d) review the effectiveness of any corrective action taken;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>c) internal monitoring programme, including definition, implementation and monitoring of corrective and preventive measures”</p> <p>7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme (...) According to this analysis, corrective (...) and preventive (...) measures shall be implemented covering the following elements:</p> <p>d) means for the evaluation of their implementation (e.g. follow-up audit, evidence submitted by the participant, etc.).</p>
e) make changes to the group management system, if necessary.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme (...) assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants’ level) and preventive (in case of systematic non-conformities) measures shall be implemented”</p>
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	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <p>d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;”</p> <p>Explanation provided by PEFC Germany</p> <p>"Documented information of the nature of nonconformities based on external audits is part of the annual audit report of the respective cb. The Regional Working Group as auditee is in possession of these reports."</p>
b) the results of any corrective action.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.8 The regional working group shall keep up-to-date records that cover:</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;"</p> <p>Explanation provided by PEFC Germany</p> <p>"if there is a nonconformity identified during an external audit, the regional working group is in charge of asking corrective and preventive actions from the participant. According to PEFC D 1001, ch. 7.1.1.7 there are procedures „that shall cover ... monitoring of corrective and preventive measures."</p>
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	<p>PEFC D 1001:2020 V3</p> <p>"6.2.4 In case, participation has been terminated because of non-conformities against the requirements for regional certification (see 6.3.5), the re-application for participation can be submitted at the earliest 12 months after exclusion. The application shall include the self-commitment and a confirmation of a certification body that the non-conformity(ies) have been corrected successfully."</p> <p><i>It shall be noted that in the German PEFC Scheme the audit of the participant that wishes to re-enter the group is to be conducted by a certification body, and not necessarily the group entity (as required in the PEFC benchmark standard).</i></p>
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	<p>PEFC D 1001:2020 V3</p> <p>"5.1.3 The regional working group shall ensure that the regional management system is continuously reviewed for suitability, adequacy and effectiveness and continuously improved;</p> <p>7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management</p> <p>7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region"</p>



Part III: PEFC Checklist for Sustainable Forest Management

1 Scope

Part III covers requirements for sustainable forest management as defined in PEFC ST 1003:2018, Sustainable Forest Management – Requirements.

2 Checklist

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	PEFC D 1001:2020 V3 “1. Scope 1.1 This document provides requirements for actors involved in the regional certification, in particular for the regional working group representing the region and for participants in the regional certification. 1.2 This document includes mandatory requirements for the actors in the regional certification. 1.3 The regional certification is the only approach of forest management certification against the PEFC German scheme. It does not apply to forest areas that are managed exclusively for the production of Christmas trees and ornamental brush-wood.” <i>The requirements of PEFC D 1001:2020 and PEFC D 1002-1:2020 include management and performance requirements that are applicable at the forest management unit level. It shall be noted that only regional (group) certification is allowed in the German PEFC Scheme. Management requirements are therefore partially regulated at group entity level (regional working group).</i>
b) be clear, performance based and auditable;	YES	<i>The standard is clearly structured, and requirements are clear, performance based and auditable.</i> <i>Observations:</i>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> - PEFC D 1002-1:2020 does not include definitions on specific terms; - In a few cases, the wording of requirements in PEFC D 1002-1:2020 remains a bit general or vague, which might be difficult to audit, such as <ul style="list-style-type: none"> o Special care shall be given to riparian zones and the quality of ground and surface water in water protection areas. (Clause 5.2) o Sites with acknowledged extraordinary historic, cultural or religious importance shall be managed with special care. (Clause 6.11) - PEFC D 1002-1:2020 includes guidance chapters on specific matters. These are mostly written in the non-normative way (using words as 'should', 'could', 'may' and 'can'), and thus not auditable, whereas in a few cases it is written in a normative way, such as Guidance 1 on the content of a forest management plan (though confusingly the title of Guidance 1 is written as: "How should a management plan be designed?"). - PEFC D 1001:2020 Annex 1 contains a list of indicators and includes references to PEOLG and Vienna indicators. The PEOLG and Vienna indicators are however (largely) written in a non-normative way. It is unclear whether they are normative under the German PEFC Scheme, and leaves interpretation open to the implementers of the standard.
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	YES	<p>PEFC D 1002-1:2020 V2</p> <p>"6.3 Forest service enterprises and commercial contract cutters acting in the forest shall have the necessary qualification for their job</p> <p>6.4 Only forest service enterprises and commercial contract cutters shall be appointed which can provide a certificate endorsed by PEFC Germany*.</p> <p>a) The requirements listed in guidance 8 can be considered as fulfilled if the forest service enterprises and enterprises conducting contract cuttings hold a certificate endorsed by PEFC</p> <p>b) This regulation does not affect:</p> <ul style="list-style-type: none"> - enterprises exempted from turnover tax according to § 19 of taxation of small enterprises (UStG „Besteuerung der Kleinunternehmer“). - cutting and hauling of proven calamity wood, if this is not fully or highly mechanised. <p>Explanation: This refers to all timber harvesting methods in which mainly crane harvesters and forwarder tractors are used, if necessary with motor-manual felling/logging; it does not refer to special methods (e.g. cable crane, Laubauer method).</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>In this case, the forest owner ensures compliance with the PEFC standards (see Guideline 8) through his own inspections/checks and documents them.</p> <p>c) The term „forest operations“ includes the following: wood harvest, hauling, tending and planting.”</p> <p><i>PEFC D 1001:2020 applies to the Regional Working Groups and its participants and PEFC D 1002-1:2020 applies to the forest owners and other forest operators as regulated in clauses 6.3 and 6.4.</i></p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>e) records keeping.</p> <p>7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <p>c) records relating to the objectives and action programme, its implementation, monitoring and review;</p> <p>d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;</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>PEFC D 1001:2020 V3</p> <p>“7.2 Responsibilities of the participants</p> <p>The participant in the regional certification shall:</p> <p>g) declare the products sold as "PEFC certified" in accordance with the requirements set out in Annex 5.</p> <p>Annex 5: Correct use of the PEFC declaration</p> <p>The participant may select one or more documents to be used for communicating the PEFC declaration ("100 % PEFC certified"). (...)"</p> <p>PEFC D 1002-1:2020 V2</p> <p>“Responsibilities of the participant</p> <p>d) declare the products sold as "PEFC certified" in accordance with the requirements set out in PEFC D 1001, Annex 5 and fulfil the requirements for trademark usage (PEFC D ST 2001).”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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>PEFC D 1002-1:2020 V2</p> <p>“Responsibilities of the participant</p> <p>d) declare the products sold as “PEFC certified” in accordance with the requirements set out in PEFC D 1001, Annex 5 and fulfil the requirements for trademark usage (PEFC D ST 2001).</p> <p>Scope</p> <p>These standards refer exclusively to the sustainable management of forests (absolute forest area and unproductive area). Forest areas which are managed for special purposes can be excluded from the PEFC certified area upon request by the forest owner. (...) These special areas shall be documented and reported to the regional working group. Products from these areas must not be sold as PEFC certified or labelled with the PEFC logo. Exceptions: (1) Christmas trees stemming from regular forest tenure like thinning, and (2) products from Christmas tree and ornamental brush-wood plantations certified on an individual basis according to the PEFC standard for Christmas tree plantations.”</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>PEFC D 1002-1:2020 V2</p> <p>“Responsibilities of the participant</p> <p>d) declare the products sold as “PEFC certified” in accordance with the requirements set out in PEFC D 1001, Annex 5 and fulfil the requirements for trademark usage (PEFC D ST 2001).”</p> <p>PEFC D 2002-1:2014</p> <p>“4.1 The organisation shall use the claim „Regional wood from [name of the region]“ when communicating the content of PEFC Regional certified material from a specific region in output products.</p> <p>4.2 The organisation shall decide which region (based on table 1) shall be used for the claim on certain products/ product groups within the scope of the chain of custody. The organisation can use one of the regions pre-defined on the levels I to III. It can also define an individual region within level III under the condition that it is unambiguously identifiable and geographically definable and an approval of PEFC Germany exists.</p> <p>5. Requirements for the origin categories of input material</p> <p>5.1 Certified material</p> <p>5.1.1 Forest-based material which is delivered by either:</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>- A forest owner/ forestry association participating in a regional certification according to the German PEFC scheme whose forest areas are located in the region to which the claim refers. This material shall be delivered with the claim "PEFC certified" or "Regional wood from [name of the region]".</p> <p>- Forest related industry with a chain of custody certificate that has been issued against PEFC D ST 2002 and PEFC D 2002-1. This material shall be delivered with the claim "Regional wood from [name of the region]" referring to the same region or to a related subordinate level (see table 1)."</p>
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	YES	<p>PEFC D 1002-1:2020 V2</p> <p>"Responsibilities of the participant</p> <p>d) declare the products sold as "PEFC certified" in accordance with the requirements set out in PEFC D 1001, Annex 5 and fulfil the requirements for trademark usage (PEFC D ST 2001)."</p> <p>PEFC D 1001:2020 V3</p> <p>"Annex 5: Correct use of the PEFC declaration</p> <p>The participant may select one or more documents to be used for communicating the PEFC declaration ("100 % PEFC certified").</p> <p>The following figure illustrates how the PEFC declaration shall be integrated into the document accompanying the delivery.</p> <p>6. Official PEFC declaration: "100 % PEFC certified" or "100 % PEFC" or "100 % from PEFC forests"</p> <p>7. Certificate number of the region (For current list see https://pefc.de/zertifikatsnummern)"</p> <p><i>The information to be provided to a PEFC chain of custody certified customer is presented in Annex 5 of PEFC D 1001:2020.</i></p>
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	<p>PEFC D 1002-1:2020 V2</p> <p>"0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p> <ul style="list-style-type: none"> • legislation referring to international conventions (e.g. Convention on Biological Diversity, Kyoto Protocol and Carbon Sinks, Convention on International Trade in Endangered Species of Wild



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Fauna and Flora [CITES], Biosafety Protocol, Core ILO conventions [International Labour Organisation]),</p> <ul style="list-style-type: none"> • the relevant national and state legislation and • all relevant contractual obligations of the forest owners as signatory (e.g. agreements on tariffs). ” <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>b) provide an overview of the legislation in the region/province that is relevant to sustainable forest management; this should be based on the list of relevant federal legislation in Annex 6; Annex 6: Federal legislation relevant to sustainable forest management and the implementation of the PEFC standards”</p>
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>PEFC D 1001:2020 V3</p> <p>“7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region to ensure that:</p> <p>a) the objectives are operational, measurable and achievable within a specific timeframe;</p> <p>b) the action programme provides for specific measures, including responsibilities and dates of their completion.</p> <p>The objectives and action programmes will be presented to all relevant stakeholders in an appropriate form. They will be given the opportunity to comment.”</p> <p>7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities concerning:</p> <p>a) state of the forests, typical forest management practices within the region and their effect on sustainable forest management;</p> <p>b) the objectives and the action programme;</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		c) requirements for sustainable forest management defined in PEFC D 1002-1:2020; d) role and delivery of the regional certification.”
b) the relevant needs and expectations of these stakeholders.	YES	PEFC D 1001:2020 V3 “7.1.1.3 (...) The objectives and action programmes will be presented to all relevant stakeholders in an appropriate form. They will be given the opportunity to comment. 7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities 7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover: a) structure and decision making within the regional working group, including access and participation of stakeholders; (...)”
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	PEFC D 1001:2020 V3 “4.1 The regional organisation represented by the regional working group shall be created for an individual state of the Federal Republic of Germany. Any geographical overlap with another regional organisation shall be precluded. 4.2 The regional organisation has an overall responsibility for the implementation of the requirements of this document and participant’s compliance with the requirements for sustainable forest management as defined in PEFC D 1002-1 4.5 Where a single forest property is located in more than one region, it shall either (i) participate with the whole forest area in the regional organisation to which prevailing forest area belongs or (ii) the area shall be divided and participate in the respective regional organisations. 4.6 The participant shall participate in the regional organisation with the whole forest area located in the respective region. 4.7 In case a participant owns forest in more than one region, a single registration number can be applied for.”
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and	YES	PEFC D 1001:2020 V3



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>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.</p>		<p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <ul style="list-style-type: none"> a) cover the indicators for sustainable forest management defined in annex 1; c) provide information on the state of forests of the entire region; d) identify areas for improvement of the sustainable forest management within the region; e) be based on information and data from forest inventories and other data sources. The preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (Bundeswaldinventur) and shall be completed within one year after the publication of the results of the same. <p>Note: the assessment cycle of the national forest inventory is 10 years.</p> <p>7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region to ensure that:</p> <ul style="list-style-type: none"> a) the objectives are operational, measurable and achievable within a specific timeframe; b) the action programme provides for specific measures, including responsibilities and dates of their completion.(...) <p>7.1.1.4 The regional working group shall monitor and assess the implementation of the action programme and the participants' compliance with the requirements for the regional certification using:</p> <ul style="list-style-type: none"> a) results of the internal monitoring programme (ch. 7.1.2.2); b) information from parties responsible for the implementation of the specific measures of the action programme; c) information and data from other parties and external sources relevant to the objectives and the action programme.” <p>PEFC D 1002-1:2020 V2</p> <p>“Guidance 1</p> <p>Forest enterprises with an area bigger than 100 ha shall have a forest management plan or a written management concept which include the following items:</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) Register of all wooded areas.</p> <p>b) Maps.</p> <p>c) Stand descriptions or enterprise description „forest“.</p> <p>d) Overview over the age classes (separately for the tree species), also the results of samplings are possible.</p> <p>e) Inventory of increment and stocking.</p> <p>f) Definition of targets (including a definition of ecological, economic and social targets according to PEFC).</p> <p>g) Medium-term planning.</p> <p>h) Climate adaptation strategy, e. g. target stocking planning</p> <p>i) Calculation of the allowable cut.</p> <p>Expert plans for forest enterprises with an area smaller than 100 ha shall include at least items No. a), b), e) und i). Instead of the calculation of increment and stockage (No. 5) these items can be estimate by the means of yield tables.</p> <p>All forest owners without written management plans shall present the certification body their targets and plan (cutting, tending, regeneration) in detail.”</p> <p><i>The appropriate assessment of the social, environmental and economic impacts of forest management practices is covered by the assessments mentioned under 7.1.1.2e, and the impacts to be planned and monitored under 7.1.1.3 and 7.1.1.4. Furthermore, PEOLG indicators 3.2c, 4.2b and 5.1a refere to impacts related to infrastructure, water and selection of species.</i></p> <p><i>The PEOLG and Vienna indicators are (largely) written in a non-normative way (using wording as ‘should’ and define it as voluntary guidelines). However, based on the wording of clause 7.1.1.2 (“The Regional Forest Report shall (...) cover the indicators for sustainable forest management defined in annex 1”) it is concluded that these indicators shall be read as normative.</i></p>
5. Leadership		
5.1 The standard requires that the organisation shall provide a commitment:		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;	YES	PEFC D 1001:2020 V3 “7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.”
b) to continuously improve the sustainable forest management system.	YES	PEFC D 1001:2020 V3 “7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.”
5.2 The standard requires that this commitment shall be publicly available.	YES	PEFC D 1001:2020 V3 “7.1.1.1 The regional working group shall make a public commitment on behalf of the participants in the regional certification and other stakeholders involved in the regional working group to implement and continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 and the PEFC D 1002-1 within the respective region.”
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	YES	PEFC D 1001:2020 V3 “6.1 Responsibilities of the regional working group 6.1.1 The regional working group shall perform the following tasks to ensure participation of the participants in the regional certification: a) to make available to all actors specified under 5.2.1 the self-commitment as specified in annex 2; b) to receive, evaluate and register the self-commitments received from the potential participants; c) to issue the confirmations on participation in the regional organisation to the participants. d) maintain a database in which the data of the participants, in particular their forest area data, are recorded and which is to be updated regularly.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>6.2 Responsibilities of the participant</p> <p>6.2.1 The potential participant covered by 5.2.1 a, b, shall submit to the regional working group the self-commitment specified in annex 2, Part I.</p> <p>6.2.2 The forestry association covered by 5.2.1c shall submit on behalf of its members to the regional working group a collective self-commitment specified in annex 2, Part II. The commitment shall be made based on the majority decision of the association's decision making body.</p> <p>6.2.3 The forestry association acting as an intermediary body covered by 5.2.1d shall submit on behalf of its members willing to participate in the regional certification to the regional working group a collective self-commitment specified in annex 2, Part III</p> <p>6.2.4 In case, participation has been terminated because of non-conformities against the requirements for regional certification (see 6.3.5), the re-application for participation can be submitted at the earliest 12 months after exclusion. The application shall include the self-commitment and a confirmation of a certification body that the non-conformity(ies) have been corrected successfully.”</p>
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>PEFC D 1001:2020 V3</p> <p>“7.1.2.2.2 The regional working group shall evaluate information from external parties, such as governmental bodies, forestry associations, research institutions, non-governmental organisations that are relating to the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage. The results of this evaluation shall be considered within the internal audit programme.”</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>PEFC D 1002-1:2020 V2</p> <p>“1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures the strategic balancing of harvesting and growth rates on the long term (see guidance 1). For stands that are currently threatened by climate change, the management plans must be adapted accordingly.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Guidance 1</p> <p>Forest enterprises with an area bigger than 100 ha shall have a forest management plan or a written management concept which include the following items:</p> <ul style="list-style-type: none"> a) Register of all wooded areas. b) Maps. c) Stand descriptions or enterprise description „forest“. d) Overview over the age classes (separately for the tree species), also the results of samplings are possible. e) Inventory of increment and stocking. f) Definition of targets (including a definition of ecological, economic and social targets according to PEFC). g) Medium-term planning. h) Climate adaptation strategy, e. g. target stocking planning i) Calculation of the allowable cut. <p>Expert plans for forest enterprises with an area smaller than 100 ha shall include at least items No. a), b), e) und i). Instead of the calculation of increment and stockage (No. 5) these items can be estimate by the means of yield tables.</p> <p>All forest owners without written management plans shall present the certification body their targets and plan (cutting, tending, regeneration) in detail.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <ul style="list-style-type: none"> e) (...) preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (Bundeswaldinventur) and shall be completed within one year after the publication of the results of the same. <p>Note: the assessment cycle of the national forest inventory is 10 years.”</p>
6.2 Management plan		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
6.2.1 The standard requires that management plans shall be:		
a) elaborated and periodically updated or continually adjusted;	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures the strategic balancing of harvesting and growth rates on the long term (see guidance 1). For stands that are currently threatened by climate change, the management plans must be adapted accordingly.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>e) (...) preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (Bundeswaldinventur) and shall be completed within one year after the publication of the results of the same.</p> <p>Note: the assessment cycle of the national forest inventory is 10 years.”</p>
b) appropriate to the size and use of the forest area;	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. (...)</p> <p>Guidance 1</p> <p>Forest enterprises with an area bigger than 100 ha shall have a forest management plan or a written management concept which include the following items: (...) Expert plans for forest enterprises with an area smaller than 100 ha shall include at least items No. a), b), e) und i). Instead of the calculation of increment and stockage (No. 5) these items can be estimate by the means of yield tables.</p> <p>All forest owners without written management plans shall present the certification body their targets and plan (cutting, tending, regeneration) in detail.”</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> • legislation referring to international conventions (...) • the relevant national and state legislation and • all relevant contractual obligations of the forest owners as signatory (...)
d) adequately covering forest resources.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“Guidance 1</p> <p>Forest enterprises with an area bigger than 100 ha shall have a forest management plan or a written management concept which include the following items:</p> <p>a) Register of all wooded areas.</p> <p>Expert plans for forest enterprises with an area smaller than 100 ha shall include at least items No. a), b), e) und i). Instead of the calculation of increment and stockage (No. 5) these items can be estimate by the means of yield tables.</p> <p>All forest owners without written management plans shall present the certification body their targets and plan (cutting, tending, regeneration) in detail.”</p>
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>PEFC D 1002-1:2020 V2</p> <p>“1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures the strategic balancing of harvesting and growth rates on the long term (see guidance 1). For stands that are currently threatened by climate change, the management plans must be adapted accordingly.</p> <p>1.2 A permanent forest cover shall be maintained. In cases of openings, i.e. a reduction of stock density beyond a critical level (0,4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy.</p> <p>3.1 The forest owner shall work towards a high added value and economic success.</p> <p>3.2 The encouragement of the productive function includes the production of high timber qualities and a varied product palette within the internal objectives. The forest owner shall manage his forests in a product-oriented way, also with respect to the marketing of non-wood-products and services.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>3.5 The accessibility of the forests adapted to the demand is necessary. (...) Notably biotopes with high conservation value shall be treated with care.</p> <p>a) A forest is accessible adapted to the demand if all stands (in which harvesting is reasonable with respect to economic, ecological and social criteria) can be reached by methods of timber harvest and hauling which represent the state-of-the-art and are locally available. In forests which are not or not regularly used a basic opening-up is necessary in order to guarantee accessibility for civil protection and in cases of emergency.</p> <p>3.6 Whole trees (utilisation and removal of all parts of the tree above and below the surface) shall not be harvested. On oligotrophic soils, the tree biomass above the surface (trunk and crown) shall not be removed completely on a regular operational basis (see guidance 4)."</p>
<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, and the average annual allowable cut, including its justification.</p>	<p>YES</p>	<p>PEFC D 1002-1:2020 V2</p> <p>"1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures the strategic balancing of harvesting and growth rates on the long term (see guidance 1). For stands that are currently threatened by climate change, the management plans must be adapted accordingly.</p> <p>Guidance 1</p> <p>Forest enterprises with an area bigger than 100 ha shall have a forest management plan or a written management concept which include the following items:</p> <p>a) Register of all wooded areas.</p> <p>b) Maps.</p> <p>c) Stand descriptions or enterprise description „forest“.</p> <p>d) Overview over the age classes (separately for the tree species), also the results of samplings are possible.</p> <p>e) Inventory of increment and stocking.</p> <p>f) Definition of targets (including a definition of ecological, economic and social targets according to PEFC).</p> <p>g) Medium-term planning.</p> <p>h) Climate adaptation strategy, e. g. target stocking planning</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>i) Calculation of the allowable cut.</p> <p>Expert plans for forest enterprises with an area smaller than 100 ha shall include at least items No. a), b), e) und i). Instead of the calculation of increment and stockage (No. 5) these items can be estimate by the means of yield tables.</p> <p>All forest owners without written management plans shall present the certification body their targets and plan (cutting, tending, regeneration) in detail.”</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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“3.2 (...) The forest owner shall manage his forests in a product-oriented way, also with respect to the marketing of non-wood-products and services. ”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), 17a (use of non-timber products) and 25a (afforestations) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that:</p> <p>(b) the commercial use of non-timber products is at a scale that does not have a negative impact on their long-term sustainability.”</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>PEFC D 1002-1:2020 V2</p> <p>“1.2 A permanent forest cover shall be maintained. In cases of openings, i.e. a reduction of stock density beyond a critical level (0,4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy.</p> <p>2.5 Extensive passing-over with machinery is to be avoided. A permanent system of skid tracks shall be built up, which makes it possible to use forest machinery in a soil sensitive way. The distance between skid tracks is at least 20 meters on principle. On soils sensitive to compression the distance shall be larger. In extraordinary topographical or site specific situations it will not be necessary to build up a strictly schematic system, if this helps to prevent damages on stand and soil.</p> <p>Exceptional cases, which do allow for extensive passing-over with machinery include for instance: soil cultivation, mulching, planting, sowing. These operations are reduced to the</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>absolutely necessary extent. On soils sensitive to compression, soil-sensitive measures are taken (low soil humidity, soil-sensitive machinery).</p> <p>2.7 Felling and skidding damages on the remaining stand, seedlings and soil shall be avoided by careful forest operation.</p> <p>Skidding damages are only permissible at the most on 10% of the trees of the remaining stand. A respective order of cutting to protect the regeneration has to be paid attention to.</p> <p>3.4 The final felling / harvesting of non-mature stands is principally omitted.</p> <p>a) Coniferous stands under the age of 50 years and broad-leaved tree stands under the age of 70 years are normally considered as non-mature stands.</p> <p>b) Exceptions are:</p> <ul style="list-style-type: none"> - fast growing tree species (e.g. poplar, willow, common acacia) - coppice systems - measures to convert unproductive or not site adapted stands. <p>3.6 Whole trees (utilisation and removal of all parts of the tree above and below the surface) shall not be harvested. On oligotrophic soils, the tree biomass above the surface (trunk and crown) shall not be removed completely on a regular operational basis</p> <p>4.11 Adapted game stocks are the precondition for naturally sound forest management within the interest of biological diversity. The forest owner as owner of his own hunt or as member of a hunting cooperative works towards adapted game stocks within his respective personal and legal opportunities.”</p> <p><i>Although no explicit reference is found that the ways and means to minimise the risk of degradation and damage shall be specified in the management plans, the standard itself is already specifying such ways and means.</i></p>
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.2.2.2 The regional working group shall evaluate information from external parties, such as governmental bodies, forestry associations, research institutions, non-governmental organisations that are relating to the participants’ compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1)</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		and the PEFC logo usage. The results of this evaluation shall be considered within the internal audit programme.” Explanation by PEFC Germany “As a matter of fact all innovations in forestry and also legal restrictions are based on scientific research.”
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	PEFC D 1001:2020 V3 “7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall: a) cover the indicators for sustainable forest management defined in annex 1;”
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	<i>According to PEFC Germany, the entire Regional Forest Reports are made publicly available on www.pefc.de. It shall be noted that this does not include the forest owner specific information, which are covered in the individual forest owner's forest management plans as regulated in PEFC D 1002-1:2020 clause 1.1. This implicitly results in the exclusion of confidential information in the publicly available report.</i>
6.3 Compliance requirements		
6.3.1 Legal compliance		
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. Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the	YES	PEFC D 1001:2020 V3 “7.1.1.2 (...) The Regional Forest Report shall: b) provide an overview of the legislation in the region/province that is relevant to sustainable forest management; this should be based on the list of relevant federal legislation in Annex 6;” Explanation provided by PEFC Germany “In all Regional Forest Reports the relevant legislation is quoted for every single normative indicator.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
"legislation applicable to forest management" is defined by the VPA agreement.		<p>the Regional Working Group is "the organisation" and that the RWG is producing these Forest Reports with reference to legislation for every indicator which proves that the organisation has access and is considering the legal implications"</p> <p>PEFC D 1002-1:2020 V2</p> <p>"0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p> <ul style="list-style-type: none"> • legislation referring to international conventions (e.g. Convention on Biological Diversity, Kyoto Protocol and Carbon Sinks, Convention on International Trade in Endangered Species of Wild Fauna and Flora [CITES], Biosafety Protocol, Core ILO conventions [International Labour Organisation]), • the relevant national and state legislation and • all relevant contractual obligations of the forest owners as signatory (e.g. agreements on tariffs)." <p><i>Based on the requirement to provide an overview of relevant legislation in the region and province and further explanation provided by PEFC Germany, it is concluded that the Regional Working Group will have a clear understanding of how compliance obligations apply to the organisation.</i></p>
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>PEFC D 1002-1:2020 V2</p> <p>"0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p> <ul style="list-style-type: none"> • legislation referring to international conventions (e.g. Convention on Biological Diversity, Kyoto Protocol and Carbon Sinks, Convention on International Trade in Endangered Species of Wild Fauna and Flora [CITES], Biosafety Protocol, Core ILO conventions [International Labour Organisation]), • the relevant national and state legislation and • all relevant contractual obligations of the forest owners as signatory (e.g. agreements on tariffs)."
6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must	N.A.	<i>Anti-corruption legislation exists in Germany.</i>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
take alternative anti-corruption measures appropriate to the risk of corruption.		
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>Forest Act for Baden-Württemberg (State Forest Act - LWaldG) in the version of August 31, 1995 (translated with Google translate)</p> <p>“§ 65 Tasks of the forest authorities</p> <p>(1) The forest authorities must carry out the tasks assigned to them under this Act and other legal provisions, in particular</p> <p>4. the exercise of forest supervision and forest protection</p> <p>(2) In their planning and measures, the forest authorities must involve all authorities and bodies responsible for public affairs whose area of responsibility may be affected in good time so that they can effectively represent their interests. Insofar as essential forestry issues are affected, the representatives of the forest owners are to be heard.</p> <p>Section 78 (...) Forest protection includes the task</p> <p>1. Dangers that threaten the forest and the facilities serving its functions by third parties, to ward off and to eliminate disruptions to public security or order in the forest, as well as</p> <p>2. to prosecute unlawful acts of third parties that result in a fine within the meaning of Section 83 or Section 85 (2) or another criminal offense or fine aimed at protecting the forest or its facilities.”</p> <p><i>Forest protection is regulated through forest authorities.</i></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. Note: Guidance for the handling of tenure arrangements can be obtained from the FAO	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed.”</p> <p><i>It shall be noted that property rights in Germany are defined through Federal and regional legislation. Also, legal, customary and traditional rights related to forest land do not exist in Germany.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.		
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.	<i>It shall be noted that there are no indigenous people in Germany.</i>
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	PEFC D 1002-1:2020 V2 “0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: • legislation referring to international conventions (...), • the relevant national and state legislation” <i>It shall be noted that Human Rights are enshrined in Germany’s Basic Law.</i>
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>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p> <ul style="list-style-type: none"> • legislation referring to international conventions (e.g. (...) Core ILO conventions)”
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>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p> <ul style="list-style-type: none"> • legislation referring to international conventions (...), • the relevant national and state legislation” <p>6. Socio-economic functions of forests</p> <p>It is the aim, that the forest owner bears his responsibility (...) for the employees in his forest in its entirety. Occupational safety and health protection are a priority in forest work.</p> <p>6.5 Health and safety regulations of the responsible insurance carrier and regulations for occupational safety shall be observed. The verification of the technical knowledge of the employees in the forestry operation is documented. Practical training courses are recorded. An efficient chain of survival shall be established.</p> <p>6.6 For hand-held implements with combustion engine special fuels (benzol free) shall be used. Private contract cutters shall provide evidence about the use of special fuels (self-commitment).</p> <p>6.7 All employees in the forest enterprise shall have access to an appropriate training as well as to advanced and further education. Such measures shall be documented. In addition to the courses offered by the training providers, the company's participation in non-binding practical training courses provided by the accident insurance institution is also recognised.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Occupational Safety and Health Act of 7. August 1996 as amended in 2019</p> <p>“Section 5 (1) The employer shall determine which measures of occupational safety and health are necessary by assessing the risk to workers associated with their work. Section 8 (2) The employer must, in the light of the nature of the activities, ensure that the workers of other employers who are working in his establishment have been given appropriate training instructions regarding the risks to their safety and health when performing their activities in his establishment.</p> <p>Section 12 (1) The employer shall give workers sufficient and appropriate training regarding safety and health protection at work during their hours of work. The training shall comprise instructions and explanations which are geared specifically to the workers’ work place or area of work. Training must be given before workers take up their activity after recruitment or in the event of changes affecting their job or the introduction of new work equipment or new technology. The training must be adapted to developments pertaining to the risk and, if necessary, must be repeated on a regular basis.”</p> <p><i>The German Health and Safety Act and the accident prevention regulations (“Unfallverhütungsvorschriften”) contain mandatory requirements for each company, which include risks assessments and guidance and training on safe working practices.</i></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>PEFC D 1002-1:2020 V2</p> <p>0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p> <ul style="list-style-type: none"> • legislation referring to international conventions (...), • the relevant national and state legislation” <p>6. Socio-economic functions of forests</p> <p>It is the aim, that the forest owner bears his responsibility (...) for the employees in his forest in its entirety. Occupational safety and health protection are a priority in forest work.</p> <p>6.5 Health and safety regulations of the responsible insurance carrier and regulations for occupational safety shall be observed. The verification of the technical knowledge of the employees in the forestry operation is documented. Practical training courses are recorded. An efficient chain of survival shall be established.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>6.7 All employees in the forest enterprise shall have access to an appropriate training as well as to advanced and further education. Such measures shall be documented. In addition to the courses offered by the training providers, the company's participation in non-binding practical training courses provided by the accident insurance institution is also recognised.”</p> <p>Occupational Safety and Health Act of 7. August 1996 as amended in 2019</p> <p>“Section 12 Training</p> <p>(1) The employer shall give workers sufficient and appropriate training regarding safety and health protection at work during their hours of work. The training shall comprise instructions and explanations which are geared specifically to the workers’ work place or area of work. Training must be given before workers take up their activity after recruitment or in the event of changes affecting their job or the introduction of new work equipment or new technology. The training must be adapted to developments pertaining to the risk and, if necessary, must be repeated on a regular basis.</p> <p>(2) Where workers are supplied temporarily to another employer, the obligation to provide the training in accordance with subsection (1) shall be on the employer taking on the temporary workers. He shall give the training taking account of the qualification and experience of the persons supplied temporarily to him. The other obligations regarding health and safety protection on the employer hiring out the workers shall remain unaffected.”</p> <p><i>Legislation relating to working hours is found in the “Arbeitszeitgesetz” (Working Hours Act), and legislation relating to leave is found in the “Bundesurlaubsgesetz” (Federal Leave Act).</i></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>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance:</p> <ul style="list-style-type: none"> • legislation referring to international conventions • the relevant national and state legislation and • all relevant contractual obligations of the forest owners as signatory (e.g. agreements on tariffs). <p>6.8 The employees in forestry shall be employed on the basis of valid agreements on tariffs. If an individual enterprise or employee is not bound to an agreement on tariffs, comparable terms and conditions which are regionally valid for forestry, e.g. the tariff for the respective sector of</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		the forestry production stage or the tariff for forestry employees) are used. They shall become part of the work contracts.”
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.	YES	PEFC D 1002-1:2020 V2 “0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: <ul style="list-style-type: none"> • legislation referring to international conventions • the relevant national and state legislation and • all relevant contractual obligations of the forest owners as signatory” <i>It shall be noted that in Germany this is regulated under the General Equal Treatment Act (AGG), which contains requirements to protect against discrimination.</i>
7. Support		
7.1 Resources		
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.	YES	PEFC D 1001:2020 V3 “4.2 The regional organisation has an overall responsibility for the implementation of the requirements of this document and participant’s compliance with the requirements for sustainable forest management as defined in PEFC D 1002-1. 5.1.3 The regional working group shall ensure that (...) the necessary resources are identified and allocated for the establishment, implementation, maintenance, and continuous improvement of the regional processes.”
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	PEFC D 1002-1:2020 V2 “6.1 In case that own staff is employed, a number of staff specialised in forestry, which is appropriate to the operational situation of the forest enterprise, shall be maintained or added. Workers will be considered as specialised staff if they have finished the respective training for the job or have work experience of several years. 6.2 Private contract cutters shall provide evidence about their participation in a qualified chain-saw training.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) Evidence is given by the provision of a certificate of participation which specifies the contents of the training.</p> <p>b) A chain-saw training is considered qualified if it enables the private cutter to harvest (standing trees) and cut (lying trees).</p> <p>c) With a written commitment the private cutter confirms that the wood is acquired for private use and there is no commercial interest.</p> <p>6.3 Forest service enterprises and commercial contract cutters acting in the forest shall have the necessary qualification for their job</p> <p>6.7 All employees in the forest enterprise shall have access to an appropriate training as well as to advanced and further education. Such measures shall be documented. In addition to the courses offered by the training providers, the company's participation in non-binding practical training courses provided by the accident insurance institution is also recognised."</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.	YES	<p>PEFC D 1001:2020 V3</p> <p>"7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities concerning:</p> <p>a) state of the forests, typical forest management practices within the region and their effect on sustainable forest management;</p> <p>b) the objectives and the action programme;</p> <p>c) requirements for sustainable forest management defined in PEFC D 1002-1;</p> <p>d) role and delivery of the regional certification."</p> <p><i>It shall be noted that there are no indigenous peoples in Germany.</i></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>PEFC D 1001:2020 V3</p> <p>"7.1.1.6 The regional working group shall establish a complaints and appeal resolution mechanism dealing with complaints and appeals relating to the implementation of the requirements for the regional certification (PEFC D 1001) and for sustainable forest management (PEFC D 1002-1)</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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	<p>PEFC D 1001:2020 V3</p> <p>"7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>e) records keeping</p> <p>7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <p>a) the participants, including their contact details, respective forest area; self-commitments received and the confirmations issued;</p> <p>b) total forest area (certified area) of the region;</p> <p>c) records relating to the objectives and action programme, its implementation, monitoring and review;</p> <p>d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;</p> <p>e) the complaints and appeals mechanism."</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>PEFC D 1001:2020 V3</p> <p>"7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>a) structure and decision making within the regional working group, including access and participation of stakeholders;</p> <p>b) participation in the regional certification, including acceptance, suspension and termination of the participation;</p> <p>c) internal monitoring programme, including definition, implementation and monitoring of corrective and preventive measures;</p> <p>d) complaints and appeal mechanism (see PEFC D 3003);</p> <p>e) records keeping</p> <p>7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <p>a) the participants, including their contact details, respective forest area; self-commitments received and the confirmations issued;</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		b) total forest area (certified area) of the region; c) records relating to the objectives and action programme, its implementation, monitoring and review; d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures; e) the complaints and appeals mechanism.”
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	PEFC D 1002-1:2020 V2 “1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures the strategic balancing of harvesting and growth rates on the long term (...). For stands that are currently threatened by climate change, the management plans must be adapted accordingly. “1.2 A permanent forest cover shall be maintained. In cases of openings, i.e. a reduction of stock density beyond a critical level (0,4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy. Guidance 1 Forest enterprises with an area bigger than 100 ha shall have a forest management plan or a written management concept which include the following items: (...) e) Inventory of increment and stocking. f) Definition of targets (including a definition of ecological, economic and social targets according to PEFC).”
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	YES	PEFC D 1002-1:2020 V2 “1. Forest Resources The aim is to manage the forest in a comprehensively sustainable way. Forest resources and their varied forest functions shall be maintained and where necessary improved; their contribution to global carbon cycles shall be enhanced. Measures to strengthen their carbon



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.		<p>sink potential will be implemented where possible. Measures to increase the CO₂ binding in forests and wood products are implemented wherever possible.</p> <p>1.1 Forest management plans adapted to the size and intensity of the enterprise shall be elaborated. They incorporate ecological, economic and social targets in terms of PEFC. Forest management is carried out according to the management plans and secures the strategic balancing of harvesting and growth rates on the long term</p> <p>2.7 Felling and skidding damages on the remaining stand, seedlings and soil shall be avoided by careful forest operation.</p> <p>Skidding damages are only permissible at the most on 10% of the trees of the remaining stand. A respective order of cutting to protect the regeneration has to be paid attention to.</p> <p>3.6 Whole trees (utilisation and removal of all parts of the tree above and below the surface) shall not be harvested. On oligotrophic soils, the tree biomass above the surface (trunk and crown) shall not be removed completely on a regular operational basis.”</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>PEFC D 1002-1:2020 V2</p> <p>“1. Forest Resources</p> <p>The aim is to manage the forest in a comprehensively sustainable way. Forest resources and their varied forest functions shall be maintained and where necessary improved; their contribution to global carbon cycles shall be enhanced. Measures to strengthen their carbon sink potential will be implemented where possible. Measures to increase the CO₂ binding in forests and wood products are implemented wherever possible. The substitution of non-renewable energy and material sources receives special attention.”</p>
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; and	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation <p>1.3 Wood stemming from the conversion of forests (change of utilization) can only be declared „PEFC certified“, if the clearing is legally authorised according to nature conservation and forest law.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Explanation provided by PEFC Germany</p> <p>“Forest is a land use type protected by law. Forest conversion requires a government approval process. In the course of this process forest and nature protection authorities are involved. This procedure is applied whether the forest is of special environmental value or not. If there is a high ecological value the rules will be stricter, like the obligation for compensation.</p> <p>The procedures for forest conversion, i.e. the conversion into another land use, like wind mills, are defined in forest legislation. A conversion is only possible if the nature conservation authority approves it. In case of larger projects an environmental impact assessment and a planning approval process is necessary in which the affected stakeholders are involved.”</p> <p><i>The Federal Forest Act of 1975 is found and indeed regulates the conversion of forest.</i></p>
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	NO	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation <p>1.3 Wood stemming from the conversion of forests (change of utilization) can only be declared „PEFC certified“, if the clearing is legally authorised according to nature conservation and forest law.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that:</p> <p>(a) forest conversions do not affect more than 5% of the certified forest area in the region”</p> <p><i>It is insufficiently ensured that the conversion entails a small proportion of the forest type, as clause 7.1.1.3a (a) is referring to a small proportion of the (total) certified forest area.</i></p>
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“0. Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation (...)



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>1.3 Wood stemming from the conversion of forests (change of utilization) can only be declared „PEFC certified“, if the clearing is legally authorised according to nature conservation and forest law.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that:</p> <p>(a) forest conversions (...) do not have negative impacts on ecologically important forest areas, culturally and socially significant areas or other protected areas;”</p>
d) does not destroy areas of significantly high carbon stock; and	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation (...) <p>1.3 Wood stemming from the conversion of forests (change of utilization) can only be declared „PEFC certified“, if the clearing is legally authorised according to nature conservation and forest law.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that:</p> <p>(a) forest conversions (...) do not lead to the destruction of areas with particularly high carbon stocks;”</p>
e) makes a contribution to long-term conservation, economic, and social benefits.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation (...) <p>1.3 Wood stemming from the conversion of forests (change of utilization) can only be declared „PEFC certified“, if the clearing is legally authorised according to nature conservation and forest law.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		PEFC D 1001:2020 V3 “7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that: (a) forest conversions (...) contribute to longterm conservation and economic and social benefits.”
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	PEFC D 1002-1:2020 V2 “0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...) <ul style="list-style-type: none"> • the relevant national and state legislation (...) Explanation by PEFC Germany: “As forest owners participating in PEFC are obliged to conform to national and regional legislation they have no freedom of action to afforest land. German law clearly distinguishes between agricultural and forest land. For regions with very low forest cover there are subsidy programmes in place to promote afforestation.” <i>In the German context, it can be assumed that afforestation will be in compliance with applicable policy and legislation.</i>
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	PEFC D 1002-1:2020 V2 “0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...) <ul style="list-style-type: none"> • the relevant national and state legislation (...) Explanation by PEFC Germany: “As forest owners participating in PEFC are obliged to conform to national and regional legislation they have no freedom of action to afforest land. German law clearly distinguishes between agricultural and forest land. For regions with very low forest cover there are subsidy programmes in place to promote afforestation.”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Afforestations always need a governmental permission. Nature conservation authorities and other authorities have to approve such measures. Ecologically important areas are normally situated in protected areas. The nature protection regulations in these areas do not allow a deterioration, e.g. given by an afforestation.”</p> <p>German Federal Forest Act 1975 (2017) (Bundeswaldgesetz)</p> <p>“Section 10 First afforestation</p> <p>(1) The first afforestation of areas requires the approval of the authority responsible under state law. Approval may only be refused if the requirements of spatial planning and state planning stand in the way of afforestation and they cannot be met by imposing conditions. § 9 paragraph 1 sentence 2 applies accordingly.</p> <p>“§ 9 Conservation of the forest</p> <p>(1) (...) When deciding on an application for conversion, the rights, obligations and economic interests of the forest owner as well as the interests of the general public must be weighed against and among one another.”</p>
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	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation” <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that:</p> <p>(c) afforestation of ecologically valuable non-forest ecosystems (EADS) does not have a negative impact on threatened EADS (including threatened, rare or endangered), culturally and socially significant areas, important habitats of endangered species or other protected areas;”</p>
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...)</p> <ul style="list-style-type: none"> • the relevant national and state legislation”



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		PEFC D 1001:2020 V3 “7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that: (c) afforestation of ecologically valuable non-forest ecosystems (EADS) (...) affects only a small proportion of ecologically valuable EADS;”
e) does not destroy areas of significantly high carbon stock; and	YES	PEFC D 1002-1:2020 V2 “0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...) <ul style="list-style-type: none"> • the relevant national and state legislation” PEFC D 1001:2020 V3 “7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that: (c) afforestation of ecologically valuable non-forest ecosystems (EADS) (...) does not lead to the destruction of areas with particularly high carbon stocks;”
f) makes a contribution to long-term conservation, economic, and social benefits.	YES	PEFC D 1002-1:2020 V2 “0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: (...) <ul style="list-style-type: none"> • the relevant national and state legislation (...) PEFC D 1001:2020 V3 “7.1.1.3a The regional working group has additional tasks in monitoring the indicators 13a (forest conversions), (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that: (c) afforestation of ecologically valuable non-forest ecosystems (EADS) (...) contributes to long-term conservation and economic and social benefits.”
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:		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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>PEFC D 1002-1:2020 V2</p> <p>“Scope</p> <p>These standards refer exclusively to the sustainable management of forests (absolute forest area and unproductive area). Forest areas which are managed for special purposes can be excluded from the PEFC certified area upon request by the forest owner. New establishment of such areas within an already certified area is only permitted where it does not considerably impair sustainable forest management in the entire area and affect the forest functions on the special purpose areas due to their extent.</p> <p>These special areas shall be documented and reported to the regional working group. Products from these areas must not be sold as PEFC certified or labelled with the PEFC logo.</p> <p>Exceptions: (1) Christmas trees stemming from regular forest tenure like thinning, and (2) products from Christmas tree and ornamental brush-wood plantations certified on an individual basis according to the PEFC standard for Christmas tree plantations.</p> <p>a) Extensive special purpose areas are in particular Christmas tree and ornamental brush-wood plantations, short-rotation plantations on forest land, research plots and game reserves.”</p> <p><i>In the scope of PEFC D 1002-1:2020 forest plantations are named special purpose areas, which are not eligible for certification, except for Christmas trees and ornamental brush-wood – but these shall be certified according to PEFC D 1002-2:2020 (which assessment is covered in Annex 1 Part IIIA of this report). The requirement is therefore not applicable.</i></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.	<i>The requirement is not applicable - see explanation under a).</i>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	N.A.	<i>The requirement is not applicable - see explanation under a).</i>
d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	N.A.	<i>The requirement is not applicable - see explanation under a).</i>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	N.A.	<i>The requirement is not applicable - see explanation under a).</i>
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	N.A.	<i>The requirement is not applicable - see explanation under a).</i>
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	N.A.	<i>The requirement is not applicable - see explanation under a).</i>
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	N.A.	<i>The requirement is not applicable - see explanation under a).</i>
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>PEFC D 1002-1:2020 V2</p> <p>“1.2 A permanent forest cover shall be maintained. In cases of openings, i.e. a reduction of stock density beyond a critical level (0,4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy.</p> <p>2.1 Methods of integrated plant protection shall be used.</p> <p>a) Integrated plant protection: Combination of procedures giving priority to mechanical, biological, biotechnological, plant breeding as well as cultivation measures in order to minimize the use of chemicals for plant protection.</p> <p>2.3 Liming for soil protection shall only be carried out on the basis of the results of a soil or forest nutrition expertise or when sound site surveys have been carried out and documented.</p> <p>3.6 Whole trees (utilisation and removal of all parts of the tree above and below the surface) shall not be harvested. On oligotrophic soils, the tree biomass above the surface (trunk and crown) shall not be removed completely on a regular operational basis (see guidance 4).</p> <p>4.1 Apart from naturally pure stands, mixed stands with site adapted tree species shall be maintained and / or established.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Regeneration measures are used to increase the proportion of mixed species. Climate-tolerant native tree species are given special consideration.</p> <p>If foreign tree species are admixed it shall be assured that they do not disturbed by their natural regeneration the regeneration ability of other tree species with the result of their suppression.</p> <p>4.3 Structurally rich forest edges provide a habitat for a variety of plant and animal species, some of which are rare. They also have a positive effect on the internal forest climate and can reduce the risk of windthrow. The forest owner promotes structurally rich and diverse forest edges.”.</p>
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>PEFC D 1002-1:2020 V2</p> <p>“4.1 Apart from naturally pure stands, mixed stands with site adapted tree species shall be maintained and / or established.</p> <p>Regeneration measures are used to increase the proportion of mixed species. Climate-tolerant native tree species are given special consideration.</p> <p>If foreign tree species are admixed it shall be assured that they do not disturbed by their natural regeneration the regeneration ability of other tree species with the result of their suppression.</p> <p>4.3 (...) The forest owner promotes structurally rich and diverse forest edges.”</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.	N.A.	<p>Explanation provided by PEFC Germany</p> <p>“In Germany forests shall be protected against damage by fire. Forest law e. g. regulates smoking in the forest if the risk of forest fires is high. There are no regions where fire is used as part of forest management.”</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 techniques that minimise tree and/or soil damages shall be applied.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“2.5 Extensive passing-over with machinery is to be avoided. A permanent system of skid tracks shall be built up, which makes it possible to use forest machinery in a soil sensitive way.</p> <p>Exceptional cases, which do allow for extensive passing-over with machinery include for instance: soil cultivation, mulching, planting, sowing. These operations are reduced to the absolutely necessary extent.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		2.6 The permanent operability of the skid track as bearing of vehicles shall be ensured. 2.7 Felling and skidding damages on the remaining stand, seedlings and soil shall be avoided by careful forest operation.”
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.	YES	PEFC D 1002-1:2020 V2 “2.8 In order to protect the forest ecosystem from plastic residues, the use of products made of petroleum-based materials (...) is avoided as far as possible. (...) Growth covers that are no longer functional and those that have fulfilled their purpose are removed from the forest and disposed of properly. 5.5 (...) readily bio-degradable chain oils and hydraulic liquids shall be used during forest operations. An exception is the use of hydraulic liquids if technology is applied which has no separate hydraulic circuit or if the producer of the machine does not allow their use. Emergency-kit for oil loss with a sufficient binding capacity shall be carried along on board of the machine”
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	PEFC D 1002-1:2020 V2 “2.1 Methods of integrated plant protection shall be used. a) (...) giving priority to mechanical, biological, biotechnological, plant breeding as well as cultivation measures in order to minimize the use of chemicals for plant protection. 2.2 Application of plant protective agents is only used as last option, e.g. where the stand or the regrowth is gravely endangered according to the law on plant protection.”
8.2.7 The standard requires that any use of pesticides is documented.	YES	PEFC D 1002-1:2020 V2 “2.2 (...) all cases of application of plant protective [agents] requires a written expert opinion.”
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.	YES	PEFC D 1002-1:2020 V2 “2.2 Application of plant protective agents is only used as last option, e.g. where the stand or the regrowth is gravely endangered according to the law on plant protection.” Explanation provided by PEFC Germany “EU requires that Member States comply with EU level legal acts and prohibit the use of toxic chemicals as appropriate. In Germany Pflanzenschutzgesetz (Federal Plant Protection Law) specifies the national requirements. See §13, para.1: “Plant protection products must not be used if the user must expect that their use in an individual case will 1. harmful effects on human



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		or animal health or on groundwater or 2. other significant harmful effects, in particular on the natural balance.”
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. Note: “Pesticides banned by international agreements” are defined in the Stockholm Convention on Persistent Organic Pollutants.	YES	PEFC D 1002-1:2020 V2 “0.1 Legal and other requirements, the forest owner is obliged to obey, shall be followed. These requirements are for instance: • legislation referring to international conventions • the relevant national and state legislation” Explanation provided by PEFC Germany “EU requires that Member States comply with EU level legal acts and prohibit the use of toxic chemicals as appropriate. In Germany Pflanzenschutzgesetz (Federal Plant Protection Law) specifies the national requirements. See §13, para.1: “Plant protection products must not be used if the user must expect that their use in an individual case will 1. harmful effects on human or animal health or on groundwater or 2. other significant harmful effects, in particular on the natural balance.”
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	PEFC D 1002-1:2020 V2 “2.2 With the exception of the treatment of wood piles and the usage of substances for wound treatment and game damage all cases of application of plant protective requires a written expert opinion (see guidance 2). The application of plant protective is carried out in any case by a person competent to do so according to the law on plant protection. a) Plant protective agents for the purpose of this requirement are herbicides, insecticides, fungicides and rodenticides. b) A person is considered as competent according to the PEFC scheme if he holds a forest degree from university, technical college or is a forestry master craftsman.” Explanation provided by PEFC Germany “EU requires that Member States comply with EU level legal acts and prohibit the use of toxic chemicals as appropriate. In Germany Pflanzenschutzgesetz (Federal Plant Protection Law) specifies the national requirements. See §12, para.1: “Plant protection products may only be applied singly or mixed with others if they are authorised, the authorisation is not suspended



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		and only 1. in the areas of application specified in the authorisation and valid at the time, 2.in accordance with the valid conditions of use specified in the authorisation.”
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	PEFC D 1002-1:2020 V2 “2.3 Liming for soil protection shall only be carried out on the basis of the results of a soil or forest nutrition expertise or when sound site surveys have been carried out and documented. 2.4 Fertilisation to increase the timber production shall be omitted. a) Compensation measures in order to maintain or recover the original site quality, like liming for soil protection, are not considered as fertilisation. b) Planting site fertilisation for securing regeneration success is allowed.”
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	PEFC D 1002-1:2020 V2 “3.1 The forest owner shall work towards a high added value and economic success. 3.2 The encouragement of the productive function includes the production of high timber qualities and a varied product palette within the internal objectives. The forest owner shall manage his forests in a product-oriented way, also with respect to the marketing of non-wood-products and services.”
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	PEFC D 1002-1:2020 V2 “3.1 The forest owner shall work towards a high added value and economic success. 3.2 The encouragement of the productive function includes the production of high timber qualities and a varied product palette within the internal objectives. The forest owner shall manage his forests in a product-oriented way, also with respect to the marketing of non-wood-products and services.”
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	PEFC D 1002-1:2020 V2 “2.5 Extensive passing-over with machinery is to be avoided. A permanent system of skid tracks shall be built up, which makes it possible to use forest machinery in a soil sensitive way. (...) In extraordinary topographical or site specific situations it will not be necessary to build up a strictly schematic system, if this helps to prevent damages on stand and soil.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Exceptional cases, which do allow for extensive passing-over with machinery include for instance: soil cultivation, mulching, planting, sowing. These operations are reduced to the absolutely necessary extent.</p> <p>2.7 Felling and skidding damages on the remaining stand, seedlings and soil shall be avoided by careful forest operation.</p> <p>Skidding damages are only permissible at the most on 10% of the trees of the remaining stand. A respective order of cutting to protect the regeneration has to be paid attention to.”</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>PEFC D 1002-1:2020 V2</p> <p>“1.2 A permanent forest cover shall be maintained. In cases of openings, i.e. a reduction of stock density beyond a critical level (0,4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy.</p> <p>3.1 The forest owner shall work towards a high added value and economic success.</p> <p>3.2 The encouragement of the productive function includes the production of high timber qualities and a varied product palette within the internal objectives. The forest owner shall manage his forests in a product-oriented way, also with respect to the marketing of non-wood-products and services.</p> <p>3.4 The final felling / harvesting of non-mature stands is principally omitted.</p> <p>a) Coniferous stands under the age of 50 years and broad-leaved tree stands under the age of 70 years are normally considered as non-mature stands.</p> <p>b) Exceptions are:</p> <ul style="list-style-type: none"> - fast growing tree species (e.g. poplar, willow, common acacia) - coppice systems - measures to convert unproductive or not site adapted stands.” <p><i>It shall be noted that the German forestry context largely consists of owners of small forest stands. The references sufficiently ensure that forests (and their productive functions) are maintained, and harvesting is not effectuated before appropriate ages in terms of production potential – which ensures that harvesting levels at regional scale do not exceed rates that could not be sustained in the long term.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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>PEFC D 1002-1:2020 V2</p> <p>“3.5 The accessibility of the forests adapted to the demand is necessary. Herewith special care shall be put on the environmental interests. Notably biotopes with high conservation value shall be treated with care. Soil sealing with concrete or tar roads are only permissible in the case of strong reasons.</p> <p>a) A forest is accessible adapted to the demand if all stands (in which harvesting is reasonable with respect to economic, ecological and social criteria) can be reached by methods of timber harvest and hauling which represent the state-of-the-art and are locally available. In forests which are not or not regularly used a basic opening-up is necessary in order to guarantee accessibility for civil protection and in cases of emergency.”</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 on landscape, ecosystem, species and genetic levels.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“4.1 Apart from naturally pure stands, mixed stands with site adapted tree species shall be maintained and / or established.</p> <p>4.2 Rare tree and shrub species shall be promoted.</p> <p>4.4 Forest management shall take special care of protected biotopes or areas as well as of endangered tree and plant species.</p> <p>4.10 Clear cuttings shall be omitted on principle. Exceptions are permissible (...)</p> <p>5.1 All protective functions shall be taken into account in forest management in an appropriate way.</p> <p>5.2 Water bodies in forests shall not be impaired by forest management. Special care shall be given to riparian zones and the quality of ground and surface water in water protection areas. Compensation measures according to water law are not affected.”</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.	YES	<p>PEFC D 1002-1:2020</p> <p>“4.4 Forest management shall take special care of protected biotopes or areas as well as of endangered tree and plant species.</p> <p>5.1 All protective functions shall be taken into account in forest management in an appropriate way.</p> <p>5.3 (...) Special care shall be given to the protection of valuable swamp and wetland sites.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p>		<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;</p> <p>Explanation provided by PEFC Germany</p> <p>“See PEFC D 1001. Indicators 23 and 25 referring to PEOLGs 4.1a and b: inventory and mapping of the naturalness of forests and on endangered species is part of the regional plan. Annual monitoring/auditing and periodic revision of this regional plan and related action programme integrate the landscape level biodiversity protection into the requirements of regional certification.”</p> <p>Pan-European Operational Level Guidelines for Sustainable Forest Management (PEOLG)</p> <p>“4.1 Guidelines for Forest Management Planning</p> <p>a. Forest management planning should aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level and, where appropriate, diversity at landscape level.</p> <p>b. Forest management planning and terrestrial inventory and mapping of forest resources should include ecologically important forest biotopes, taking into account protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes, areas containing endemic species and habitats of threatened species, as defined in recognised reference lists, as well as endangered or protected genetic in situ resources.”</p> <p><i>Although the PEOLG indicators are referring to the identification of ecologically important forest areas, these indicators are described in a non-normative way (due to the word should). It is therefore insufficiently ensured that ecologically important areas shall be identified based on inventory, mapping and planning.</i></p> <p><i>Annex 1 of PEFC D 1001 includes the indicators, including PEOLG 4.1a and 4.1b. The PEOLG indicators are (largely) written in a non-normative way (using wording as ‘should’). However, based on the wording of clause 7.1.1.2 (“The Regional Forest Report shall (...) cover the indicators for sustainable forest management defined in annex 1”) it is concluded that these indicators shall be read as normative.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<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>	<p>YES</p>	<p>PEFC D 1002-1:2020 V2</p> <p>“4.4 Forest management shall take special care of protected biotopes or areas as well as of endangered tree and plant species.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;</p> <p>Explanation provided by PEFC Germany</p> <p>“See PEFC D 1001. Indicators 23 and 25 referring to PEOLGs 4.1a and b: inventory and mapping of the naturalness of forests and on endangered species is part of the regional plan. Annual monitoring/auditing and periodic revision of this regional plan and related action programme integrate the landscape level biodiversity protection into the requirements of regional certification.</p> <p>Germany is one of the contracting parties of the CITES convention (ratified in 1976)”</p> <p>Pan-European Operational Level Guidelines for Sustainable Forest Management (PEOLG)</p> <p>“4.1 Guidelines for Forest Management Planning</p> <p>a. Forest management planning should aim to maintain, conserve and enhance biodiversity on ecosystem, species and genetic level and, where appropriate, diversity at landscape level.</p> <p>b. Forest management planning and terrestrial inventory and mapping of forest resources should include ecologically important forest biotopes, taking into account protected, rare, sensitive or representative forest ecosystems such as riparian areas and wetland biotopes, areas containing endemic species and habitats of threatened species, as defined in recognised reference lists, as well as endangered or protected genetic in situ resources.”</p> <p><i>Annex 1 of PEFC D 1001 includes the indicators, including PEOLG 4.1a and 4.1b. The PEOLG indicators are (largely) written in a non-normative way (using wording as ‘should’). However, based on the wording of clause 7.1.1.2 (“The Regional Forest Report shall (...) cover the indicators for sustainable forest management defined in annex 1”) it is concluded that these indicators shall be read as normative.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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	PEFC D 1002-1:2020 V2 “1.2 A permanent forest cover shall be maintained. In cases of openings (...) the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy. 4.9 Regeneration methods adapted to the tree species which shall be regenerated shall be used. Natural regeneration shall be preferred”
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.	YES	PEFC D 1002-1:2020 V2 “4.1 (...) Regeneration measures are used to increase the proportion of mixed species. Climate-tolerant native tree species are given special consideration. If foreign tree species are admixed it shall be assured that they do not disturbed by their natural regeneration the regeneration ability of other tree species with the result of their suppression. 4.6 The provenance recommendations for forest seed and plant material shall be followed. 4.7 Seed and plant material with verifiable origin shall be used, as far as it is available on the market for a specific provenance. a) The verification of the origin shall be carried out according to a procedure which has been endorsed by PEFC Germany (e.g. ZÜF or FFV) or is guaranteed by control propagation for accounts of clients. The usage of wild seedlings and seed from the own forest enterprise is not affected by this requirement.” Explanation provided by PEFC Germany “According to the Forest Reproductive Material Law provenances will assess and if there are negative impacts prohibited.”
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	PEFC D 1002-1:2020 V2 “1.2 A permanent forest cover shall be maintained. In cases of openings, i.e. a reduction of stock density beyond a critical level (0,4) without existing regeneration, the stand shall be rejuvenated with site-adapted tree species. The development of natural succession shall be integrated as far as it fits to the regeneration strategy. 4.1 Apart from naturally pure stands, mixed stands with site adapted tree species shall be maintained and / or established.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>Regeneration measures are used to increase the proportion of mixed species.</p> <p>4.3 Structurally rich forest edges provide a habitat for a variety of plant and animal species, some of which are rare. They also have a positive effect on the internal forest climate and can reduce the risk of windthrow. The forest owner promotes structurally rich and diverse forest edges.</p> <p>4.10 Clear cuttings shall be omitted on principle. Exceptions are permissible”</p> <p>Explanation provided by PEFC Germany</p> <p>“As forest owners participating in PEFC are obliged to conform to national and regional legislation they have no freedom of action to afforest land. German law clearly distinguishes between agricultural and forest land, so that a requirement to promote afforestation to improve ecological connectivity would discriminate forest owners who do not own any agricultural land. For regions with very low forest cover there are subsidy programmes in place to promote afforestation.</p> <p>Managing forests according to the PEFC requirements safeguards a permanent forest cover without challenges for ecological connectivity. If natural disturbances (windthrow, bark beetle, drought) result in unforested areas, the PEFC standard No. 4.3 requires the development of edges with a variety of tree and shrub species, meaning a linear connection between the remaining forest stands.”</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>PEFC D 1002-1:2020 V2</p> <p>“4.8 Genetically modified organisms are not used.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“1.2 (...) The development of natural succession shall be integrated as far as it fits to the regeneration strategy.</p> <p>4.1 Apart from naturally pure stands, mixed stands with site adapted tree species shall be maintained and / or established.</p> <p>Regeneration measures are used to increase the proportion of mixed species.</p> <p>4.3 Structurally rich forest edges provide a habitat for a variety of plant and animal species, some of which are rare. They also have a positive effect on the internal forest climate and can reduce the risk of windthrow. The forest owner promotes structurally rich and diverse forest edges.</p> <p>4.9 Regeneration methods adapted to the tree species which shall be regenerated shall be used. Natural regeneration shall be preferred where the expected regeneration is site adapted and satisfactory with respect to quality and quantity and where planting is not necessary for the conversion into a site adapted stocking.”</p>
8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“4.10 b) Small scale utilisations, which serve the development of a natural regeneration or the conversion into an improved vertical structure or the maintenance of historic silvicultural methods (coppice systems), are not regarded as clear cuttings.</p> <p>6.11 Sites with acknowledged extraordinary historic, cultural or religious importance shall be managed with special care.”</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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“2.5 Extensive passing-over with machinery is to be avoided. (...) use forest machinery in a soil sensitive way. In extraordinary topographical or site specific situations it will not be necessary to build up a strictly schematic system, if this helps to prevent damages on stand and soil.</p> <p>Exceptional cases, which do allow for extensive passing-over with machinery include for instance: soil cultivation, mulching, planting, sowing. These operations are reduced to the absolutely necessary extent. On soils sensitive to compression, soil-sensitive measures are taken.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>2.6 The permanent operability of the skid track as bearing of vehicles shall be ensured. The formation of lanes shall be counteracted by following measures described in guidance 3.</p> <p>2.7 Felling and skidding damages on the remaining stand, seedlings and soil shall be avoided by careful forest operation.”</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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“3.5 The accessibility of the forests (...) is necessary. Herewith special care shall be put on the environmental interests. Notably biotopes with high conservation value shall be treated with care.”</p> <p>Landeswaldgesetz (State Forest Act)</p> <p>“§ 19 Construction and maintenance of forest roads</p> <p>Forest roads shall be laid out and maintained in such a way that the landscape, the forest floor and the natural balance are protected as far as possible, taking into account technical and economic aspects.”</p> <p>Bundesnaturschutzgesetz (Federal Nature Conservation Law – translated with Google translate)</p> <p>“§ 15 polluter-pays obligations, inadmissibility of interventions (...)</p> <p>(5) An intervention may not be permitted or carried out if the impairments cannot be avoided or cannot be compensated for or replaced within a reasonable period of time and the interests of nature conservation and landscape conservation take precedence over other interests when weighing up all the requirements for nature and landscape.”</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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“4.11 Adapted game stocks are the precondition for naturally sound forest management within the interest of biological diversity. The forest owner as owner of his own hunt or as member of a hunting cooperative works towards adapted game stocks within his respective personal and legal opportunities.</p> <p>a) Game stocks are considered as adapted, when the regeneration of the principal tree species is possible without protective measures, the regeneration of the secondary tree species can, if necessary, be secured with a reasonable amount of effort and fresh peeling damages of principal tree species do not occur on a considerable area.”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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	PEFC D 1002-1:2020 V2 “4.5 For the conservation of biological diversity an appropriate proportion of biotope wood, i.e. dead wood, snag and cave trees, shall be conserved and promoted. Road safety, forest protection as well as health and safety issues shall be given priority. The topic „Biotope Wood“ shall be incorporated in the management plans”
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	PEFC D 1002-1:2020 V2 “4.4 Forest management shall take special care of protected biotopes or areas (...) 4.10 Clear cuttings shall be omitted on principle. Exceptions are permissible (...) 5.1 All protective functions shall be taken into account in forest management in an appropriate way. 5.2 Water bodies in forests shall not be impaired by forest management. Special care shall be given to riparian zones and the quality of ground and surface water in water protection areas. 5.3 New draining facilities shall not be installed. (...) Special care shall be given to the protection of valuable swamp and wetland sites. 5.4 In order to protect the soil, soil cultivation scarifying the mineral soil on a considerable area as well as complete ploughing shall be omitted. 5.5 For water and soil protection reasons, readily bio-degradable chain oils and hydraulic liquids shall be used during forest operations.”
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	PEFC D 1002-1:2020 V2 “4.4 Forest management shall take special care of protected biotopes or areas (...) 4.10 Clear cuttings shall be omitted on principle. Exceptions are permissible (...) 5. Protective functions of forests (regulating ecosystem services) Forest management aims at the maintenance and appropriate enhancement of regulating ecosystem services / protective functions. These services are of special importance for the society in a densely populated country.



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>5.1 All protective functions shall be taken into account in forest management in an appropriate way.</p> <p>5.2 Water bodies in forests shall not be impaired by forest management. Special care shall be given to riparian zones and the quality of ground and surface water in water protection areas.</p> <p>5.3 New draining facilities shall not be installed. (...) Special care shall be given to the protection of valuable swamp and wetland sites.</p> <p>5.4 In order to protect the soil, soil cultivation scarifying the mineral soil on a considerable area as well as complete ploughing shall be omitted.</p> <p>5.5 For water and soil protection reasons, readily bio-degradable chain oils and hydraulic liquids shall be used during forest operations.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;”</p> <p>Pan-European Operational Level Guidelines for Sustainable Forest Management (PEOLG)</p> <p>“5.1 Guidelines for Forest Management Planning</p> <p>b. Areas that fulfil specific and recognised protective functions for society should be registered and mapped, and forest management plans or their equivalents should take full account of these areas.”</p> <p><i>Annex 1 of PEFC D 1001 includes the indicators, including PEOLG 5.1b. The PEOLG indicators are (largely) written in a non-normative way (using wording as ‘should’). However, based on the wording of clause 7.1.1.2 (“The Regional Forest Report shall (...) cover the indicators for sustainable forest management defined in annex 1”) it is concluded that these indicators shall be read as normative.</i></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	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“2.5 (...) The distance between skid tracks is at least 20 meters on principle. On soils sensitive to compression the distance shall be larger. In extraordinary topographical or site specific</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.		<p>situations it will not be necessary to build up a strictly schematic system, if this helps to prevent damages on stand and soil.</p> <p>Exceptional cases, which do allow for extensive passing-over with machinery include for instance: soil cultivation, mulching, planting, sowing. These operations are reduced to the absolutely necessary extent. On soils sensitive to compression, soil-sensitive measures are taken (low soil humidity, soil-sensitive machinery).</p> <p>2.6 The permanent operability of the skid track as bearing of vehicles shall be ensured.</p> <p>2.7 Felling and skidding damages on the remaining stand, seedlings and soil shall be avoided by careful forest operation.</p> <p>4.11 (...) The forest owner as owner of his own hunt or as member of a hunting cooperative works towards adapted game stocks within his respective personal and legal opportunities.</p> <p>a) Game stocks are considered as adapted, when the regeneration of the principal tree species is possible without protective measures”</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>PEFC D 1002-1:2020 V2</p> <p>“2.1 (...) giving priority to mechanical, biological, biotechnological, plant breeding as well as cultivation measures in order to minimize the use of chemicals for plant protection.</p> <p>2.2 Application of plant protective agents is only used as last option (...)</p> <p>5. Protective functions of forests (regulating ecosystem services)</p> <p>Forest management aims at the maintenance and appropriate enhancement of regulating ecosystem services / protective functions.</p> <p>5.2 Water bodies in forests shall not be impaired by forest management. Special care shall be given to riparian zones and the quality of ground and surface water in water protection areas.</p> <p>5.3 New draining facilities shall not be installed.</p> <p>5.5 For water and soil protection reasons, readily bio-degradable chain oils and hydraulic liquids shall be used during forest operations”</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	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“3.5 The accessibility of the forests adapted to the demand is necessary.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
<p>watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>		<p>a) A forest is accessible adapted to the demand if all stands (in which harvesting is reasonable with respect to economic, ecological and social criteria) can be reached by methods of timber harvest and hauling which represent the state-of-the-art and are locally available.</p> <p>5.2 Water bodies in forests shall not be impaired by forest management. Special care shall be given to riparian zones and the quality of ground and surface water in water protection areas.</p> <p>5.3 New draining facilities shall not be installed.”</p> <p>Explanation provided by PEFC Germany</p> <p>"Normally forest road construction is only carried out if there are state subsidies. These subsidies will only be granted if certain conditions are fulfilled, e.g. proper drainage or minimized soil exposure (see as example the Bavarian GemBek regulation: https://www.gesetze-bayern.de/Content/Document/BayVwV254385)"</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;</p> <p>Pan-European Operational Level Guidelines for Sustainable Forest Management (PEOLG)</p> <p>“5.2.c Construction of roads, bridges and other infrastructure should be carried out in a manner that minimizes bare soil exposure, avoids the introduction of soil into watercourses and that preserve the natural level and function of water courses and river beds. Proper road drainage facilities should be installed and maintained.”</p> <p><i>Annex 1 of PEFC D 1001 includes the indicators, including PEOLG 5.2c. The PEOLG indicators are (largely) written in a non-normative way (using wording as ‘should’). However, based on the wording of clause 7.1.1.2 (“The Regional Forest Report shall (...) cover the indicators for sustainable forest management defined in annex 1”) it is concluded that these indicators shall be read as normative.</i></p>
8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“1.1 Forest management plans (...) shall incorporate ecological, economic and social targets in terms of PEFC.</p> <p>6. Socio-economic functions of forests</p> <p>It is the aim, that the forest owner bears his responsibility for society and especially for the employees in his forest in its entirety. (...) The varied socio-economic functions of the forest are guaranteed and promoted.</p> <p>6.10 The public has free access to the forests for recreation purposes. Limitations are permissible especially for the protection of the ecosystem and for the reasons of forest and game management, for the protection of forest visitors, to avoid considerable damages or safeguarding important interests of the forest owner. Forest management shall respect the recreational function and the aesthetic value of the forest.”</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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“6.10 The public has free access to the forests for recreation purposes. Limitations are permissible especially for the protection of the ecosystem and for the reasons of forest and game management, for the protection of forest visitors, to avoid considerable damages or safeguarding important interests of the forest owner. Forest management shall respect the recreational function and the aesthetic value of the forest.”</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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“6.11 Sites with acknowledged extraordinary historic, cultural or religious importance shall be managed with special care.”</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	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“6.10 The public has free access to the forests for recreation purposes.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
by engagement with local communities and indigenous peoples.		6.11 Sites with acknowledged extraordinary historic, cultural or religious importance shall be managed with special care.”
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>PEFC D 1002-1:2020 V2</p> <p>“6.1 In case that own staff is employed, a number of staff specialised in forestry, which is appropriate to the operational situation of the forest enterprise, shall be maintained or added. Workers will be considered as specialised staff if they have finished the respective training for the job or have work experience of several years.”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.1.5 The regional working group shall ensure effective communication and consultation with stakeholders and local communities concerning:</p> <ul style="list-style-type: none"> a) state of the forests, typical forest management practices within the region and their effect on sustainable forest management; b) the objectives and the action programme; c) requirements for sustainable forest management defined in PEFC D 1002-1”
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.	YES	<p>PEFC D 1002-1:2020 V2</p> <p>“6.7 All employees in the forest enterprise shall have access to an appropriate training as well as to advanced and further education.”</p> <p>Additional explanation provided by PEFC Germany</p> <p>“German forestry is deeply rooted in rural economies, i.e. forest owners normally live near to their forest, employ local staff and contractors, buy plants, machines, etc. from local suppliers and sell their wood to local mills.</p> <p>It is in the interest of the forest owner to work with local staff and contractors due to their knowledge of the place.”</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>PEFC D 1002-1:2020 V2</p> <p>“4. (...) Forest management shall take into account scientific knowledge, especially from the research in natural forests, in order to make best use of natural structures and processes in terms of ecosystem services, to maintain biological diversity and to establish stands close to nature and adapted to climate change.”</p> <p>Bundeswaldgesetz (Federal Forest Act – translated with Google translate)</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>“§ 14 Entering the forest</p> <p>(1) Entering the forest for the purpose of recreation is permitted. Cycling, driving in wheelchairs and horseback riding in the forest is only permitted on roads and paths. Use is at your own risk. This applies in particular to typical forest hazards.</p> <p>(2) The states regulate the details. You can restrict access to the forest for important reasons, in particular forest protection, forest or wildlife management, to protect forest visitors or to avoid significant damage or to protect other interests of the forest owner that are worthy of protection, and equate other types of use with access in whole or in part.”</p> <p>Explanation provided by PEFC Germany</p> <p>“There are 4 forestry universities, 5 universities for applied science and 10 regional research centres (run by the state forest administration) in Germany. All have a long tradition, close-meshed network of research plots and the assignment to provide advice to forest owners.</p> <p>There are governmental regulations which safeguard that federal or regional inventories can be conducted on forest land. With respect to the German right of free access to forests forest owners have to tolerate research activities on their ground.”</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>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;</p> <p>c) provide information on the state of forests of the entire region;</p> <p>d) identify areas for improvement of the sustainable forest management within the region;</p> <p>e) (...) The (...) Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (...).</p> <p>Note: the assessment cycle of the national forest inventory is 10 years.”</p> <p>7.1.1.3 Based on the Regional Forest Report (...) the regional working group shall define objectives and an action programme for the improvement of SFM (...)”</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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>PEFC D 1001:2020 V3</p> <p>“7.1.1.2 The regional working group shall prepare and publish a Regional Forest Report that provides information on the sustainable forest management in the entire region. The Regional Forest Report shall:</p> <p>a) cover the indicators for sustainable forest management defined in annex 1;</p> <p>c) provide information on the state of forests of the entire region;</p> <p>d) be based on information and data from forest inventories and other data sources. The preparation of the Regional Forest Report shall be undertaken according to the assessment cycle of the national forest inventory (Bundeswaldinventur) and shall be completed within one year after the publication of the results of the same.</p> <p>Note: the assessment cycle of the national forest inventory is 10 years.”</p> <p>Pan-European Operational Level Guidelines for Sustainable Forest Management (PEOLG)</p> <p>“2.1 b. Health and vitality of forests should 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>Explanation provided by PEFC Germany</p> <p>“Data on grazing are collected in the scope of the national forest inventory (BWI) and are required as element of the Regional Forest Report by PEFC D 1001, indicator 22. The monitoring of all other biotic and abiotic factors is conducted regularly by the Federal Government as part of the Forest Condition Survey and the Forest Soil Survey (see https://www.bmel.de/EN/topics/forests/forests-in-germany/environmental-forest-monitoring.html)”</p> <p><i>It is noted that the Forest Condition Survey is conducted annually and provides data on crown condition, as an indicator of health of the forest. The Forest Soil Survey is conducted once in about 15 years and consists of about 1900 soil pits spread over Germany to assess long-term developments in the soil.</i></p> <p><i>Annex 1 of PEFC D 1001 includes the indicators, including PEOLG 2.1b. The PEOLG indicators are (largely) written in a non-normative way (using wording as ‘should’). However, based on the wording of clause 7.1.1.2 (“The Regional Forest Report shall (...) cover the indicators for</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<i>sustainable forest management defined in annex 1”) it is concluded that these indicators shall be read as normative.</i>
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	PEFC D 1001:2020 V3 “7.1.1.3a The regional working group has additional tasks in monitoring the indicators (...) 17a (use of non-timber products) (...) in order to ensure sustainability at regional level. Appropriate measures, to be set out in the action programme, shall be taken to ensure that: (b) the commercial use of non-timber products is at a scale that does not have a negative impact on their long-term sustainability.” Explanation provided by PEFC Germany “In Germany hunting and fishing is regulated, monitored and controlled by the state.” <i>No reference is found for the regulation, monitoring and controlling of non-wood forest products other than hunting and fishing (such as plants, fruits, mushrooms).</i>
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	YES	Explanation provided by PEFC Germany “Labour market in Germany can be considered as over-regulated (e. g. 7th Social Code, Minimum Wage Act, Occupational Safety and Health Act). Consequently there are regular checks by authorities.”
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	PEFC D 1001:2020 V3 “7.1.2.2.3 The regional working group shall establish an annual internal audit programme to a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001 and c) evaluating the participants’ compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage.”
b) is effectively implemented and maintained.	YES	PEFC D 1001:2020 V3



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>“7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p> <p>a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants,</p> <p>b) the conformity of the regional processes with the requirements of PEFC D 1001”</p>
<p>9.2.2 Organisation</p> <p>The standard requires that the organisation shall:</p>		
<p>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;</p>	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.2.2.1 The regional working group shall establish an internal monitoring programme covering all participants in the regional organisation that shall cover:</p> <p>c) an internal audit programme.</p> <p>7.1.2.2.2 The regional working group shall evaluate information from external parties (...) relating to the participants’ compliance with the requirements for regional certification (...) sustainable forest management (...) and PEFC logo usage. The results of this evaluation shall be considered within the internal audit programme.</p> <p>7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p> <p>a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants,</p> <p>b) the conformity of the regional processes with the requirements of PEFC D 1001 and</p> <p>c) evaluating the participants’ compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage.</p> <p>7.1.2.2.4 In formulating the internal audit programme, the regional working group shall</p> <p>a) take into account the results of previous audits,</p> <p>b) define the audit criteria and the scope of the audit,</p> <p>c) select the internal auditors and conduct the audits in such a way as to ensure the objectivity and impartiality of the process,</p> <p>d) present the audit results at a committee meeting,</p> <p>e) keep records as evidence of the implementation of the audit programme and audit results.</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>The sampling method is described in detail in Annex 4.</p> <p>7.1.2.2.5 Elements of an internal audit programme can be:</p> <ul style="list-style-type: none"> a) evaluation through an individual internal monitoring/ revision or quality management system or controlling of the participant; b) evaluation carried out by independent third parties; c) evaluation as part of an inventory and planning process of the participating enterprise; d) evaluation carried out by forestry associations; e) internal audit implemented or commissioned by the regional working group itself, this also includes remote audits; f) any other independent evaluation regarding the compliance of the participants with the PEFC requirements. <p>7.1.2.2.6 The regional working group shall ensure that the personnel performing the internal audits are competent (...).</p> <p>7.1.1.8 The regional working group shall keep up-to-date records that cover:</p> <ul style="list-style-type: none"> d) records relating to the internal monitoring programme (...) <p>Annex 4: Sampling procedure for the internal audit programme</p> <p>2. When selecting participants as part of the sample, the regional working group shall meet the following criteria regarding the representativeness of the sample:</p> <ul style="list-style-type: none"> b) Non-conformities and corrective actions identified as result of previous internal audits shall be taken into account.” <p><i>Additional procedures are elaborated in Annex 4 of PEFC D 1001:2020</i></p>
b) define the audit criteria and scope for each audit;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p> <ul style="list-style-type: none"> a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants, b) the conformity of the regional processes with the requirements of PEFC D 1001 and



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>c) evaluating the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage.</p> <p>7.1.2.2.4 In formulating the internal audit programme, the regional working group shall</p> <p>a) take into account the results of previous audits,</p> <p>b) define the audit criteria and the scope of the audit,</p> <p>c) select the internal auditors and conduct the audits in such a way as to ensure the objectivity and impartiality of the process,</p> <p>d) present the audit results at a committee meeting,</p> <p>e) keep records as evidence of the implementation of the audit programme and audit results.</p> <p>The sampling method is described in detail in Annex 4.</p> <p>7.1.2.2.5 Elements of an internal audit programme can be:</p> <p>a) evaluation through an individual internal monitoring/ revision or quality management system or controlling of the participant;</p> <p>b) evaluation carried out by independent third parties;</p> <p>c) evaluation as part of an inventory and planning process of the participating enterprise;</p> <p>d) evaluation carried out by forestry associations;</p> <p>e) internal audit implemented or commissioned by the regional working group itself, this also includes remote audits;</p> <p>f) any other independent evaluation regarding the compliance of the participants with the PEFC requirements.”</p>
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	YES	<p>PEFC D 3004:2017</p> <p>“4.3 The staff carrying out internal audits must be sufficiently qualified. The requirement profile is congruent with the profile defined in the advertisements for the positions of regional assistants:”</p> <p>PEFC D 1001:2020 V3</p> <p>“7.1.2.2.3 The regional working group shall establish an annual internal audit programme to</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		<p>a) assess the effectiveness of the processes at the regional level, in particular whether they are suitable to ensure the implementation of the standards at the level of the participants,</p> <p>b) the conformity of the regional processes with the requirements of PEFC D 1001 and</p> <p>c) evaluating the participants' compliance with the requirements for regional certification (PEFC D 1001), requirements for sustainable forest management (PEFC D 1002-1) and the PEFC logo usage.</p> <p>7.1.2.2.4 In formulating the internal audit programme, the regional working group shall</p> <p>a) take into account the results of previous audits,</p> <p>b) define the audit criteria and the scope of the audit,</p> <p>c) select the internal auditors and conduct the audits in such a way as to ensure the objectivity and impartiality of the process,</p> <p>d) present the audit results at a committee meeting,</p> <p>e) keep records as evidence of the implementation of the audit programme and audit results.</p> <p>The sampling method is described in detail in Annex 4.</p> <p>7.1.2.2.6 The regional working group shall ensure that the personnel performing the internal audits are competent based on the following criteria:</p> <p>a) university education in the field of forestry;</p> <p>b) minimum two years full-time working experience in forestry;</p> <p>c) knowledge about the requirements of the German PEFC scheme and about audit procedures.”</p>
d) ensure that the results of the audits are reported to relevant management;	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.1.7 The regional working group shall establish written procedures for the management of the regional certification that shall cover:</p> <p>c) internal monitoring programme, including (...) monitoring of corrective and preventive measures”</p> <p><i>As the regional working group is responsible for writing procedures for its management, including the internal monitoring programme, it is concluded that results of audits will automatically return to the group management.</i></p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	YES	PEFC D 1001:2020 V3 “7.1.1.8 The regional working group shall keep up-to-date records that cover: d) records relating to the internal monitoring programme, including implementation and monitoring of corrective and preventive measures;”
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;	N.A.	<i>In the German context the management system is to be reviewed at the level of the Regional Working Group, as this is the primary level where policies and objectives are established, as well as processes to achieve those objectives (see PEFC D 1001:2020 clause 7.1.1.3). This is further assessed in Annex 1 Part II requirement 9.4.1a.</i>
b) changes in external and internal issues that are relevant to the management system;	N.A.	<i>In the German context the management system is to be reviewed at the level of the Regional Working Group. This is further assessed in Annex 1 Part II requirement 9.4.1b.</i>
c) information on the organisation’s performance, including trends in: • nonconformities and corrective actions; • monitoring and measurement results; • audit results;	N.A.	<i>In the German context the management system is to be reviewed at the level of the Regional Working Group. This is further assessed in Annex 1 Part II requirement 9.4.1d.</i>
d) opportunities for continual improvement	N.A.	<i>For the German context the management system is to be reviewed at the level of the Regional Working Group. This is further assessed in Annex 1 Part II requirement 9.4.1e.</i>
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.	N.A.	<i>In the German context the management system is to be reviewed at the level of the Regional Working Group. This is further assessed in Annex 1 Part II requirement 9.4.2.</i>
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	N.A.	<i>In the German context the management system is to be reviewed at the level of the Regional Working Group. This is further assessed in Annex 1 Part II requirement 9.4.3.</i>
10. Improvement		



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
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;	N.A.	<i>In the German context this is regulated and implemented at the group certification level. This is further assessed in Annex 1 Part II requirement 10.1.1a.</i>
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;	N.A.	<i>In the German context this is regulated and implemented at the group certification level. This is further assessed in Annex 1 Part II requirement 10.1.1b.</i>
c) implement any action needed;	N.A.	<i>In the German context this is regulated and implemented at the group certification level. This is further assessed in Annex 1 Part II requirement 10.1.1c.</i>
d) review the effectiveness of any corrective action taken;	N.A.	<i>In the German context this is regulated and implemented at the group certification level. This is further assessed in Annex 1 Part II requirement 10.1.1d.</i>
e) make changes to the management system, if necessary.	N.A.	<i>In the German context this is regulated and implemented at the group certification level. This is further assessed in Annex 1 Part II requirement 10.1.1e.</i>
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	YES	<p>PEFC D 1001:2020 V3</p> <p>“7.1.2.3 Corrective and preventive measures</p> <p>7.1.2.3.1 The regional working group shall analyse non-conformities identified by the external audit or the internal monitoring programme and assess, whether these non-conformities are of systematic nature or specific to the individual participant. According to this analysis, corrective (on the participants’ level) and preventive (in case of systematic non-conformities) measures shall be implemented”</p> <p>PEFC D 3004:2017</p> <p>“5.8 (...) In the case of a major non-conformity that cannot be closed in the short term, this must be described in an audit report and submitted to the regional working group, which must decide</p>



PEFC benchmark requirement	YES /NO	Reference to system documentation (including quotation of relevant text)
		on the sanction, usually the exclusion of the participant. In the case of a non-conformity, it is the participant's responsibility - as in the external audit - to propose measures to remedy the deficiency / error. If the proposed corrective measures are appropriate in the eyes of the internal auditor, they are set down in writing and become binding with the participant's signature."
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;	N.A	<i>In the German context this is regulated and implemented at the group entity level. This is further assessed in Annex 1 Part II requirement 10.1.2a.</i>
b) the results of any corrective action.	N.A.	<i>In the German context this is regulated and implemented at the group entity level. This is further assessed in Annex 1 Part II requirement 10.1.2b.</i>
10.2 Continual improvement 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.	YES	PEFC D 1001:2020 V3 7.1.1.1 The regional working group shall make a public commitment (...) to (...) continuously improve sustainable forest management in compliance with the requirements specified in PEFC D 1001 (...) within the respective region. 7.1.1.3 Based on the Regional Forest Report and other sources of information, the regional working group shall define objectives and an action programme for the improvement of sustainable forest management for the entire region"



Part IV: PEFC Checklist for Certification and Accreditation Procedures

1 Scope

This document covers requirements for certification and accreditation procedures for PEFC forest management certification outlined in Annex 6 of the PEFC Council Technical Document (Certification and accreditation procedures).

The requirements of Annex 6 stipulated for chain of custody certification are not reflected in this checklist, as these requirements have been replaced by PEFC ST 2003, Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard.

References to ISO Guide 65 in Annex 6 have been removed from this checklist, as PEFC forest management certification is expected to be carried out as management certification under ISO 17021 since 2018.

2 Checklist

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	PEFC D 1003-1:2015 “Introduction This document specifies requirements for certification bodies. Observance of these requirements is intended to ensure that certification bodies operate forest management certification in a competent, consistent and impartial manner 5.1 All requirements of clause 5 ISO/IEC 17021:2015 apply.” <i>Chapter 5.2 of ISO/IEC 17021:2015 elaborately manages impartiality of the certification body.</i>
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	PEFC D 1003-1:2015 “Introduction This document is based on ISO/IEC 17021:2015 and IAF (International Accreditation Forum) documents relating to the application of ISO/IEC



No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>17021:2015. It provides additional requirements necessary for certification and auditing of sustainable forest management within the German PEFC scheme.</p> <p>5.1 All requirements of clause 5 ISO/IEC 17021:2015 apply.”</p> <p><i>A clause as 5.1 is repeated for each chapter, which ensures that the full ISO/IEC 17021:2015 is required for certification bodies.</i></p>
3.	Does the scheme documentation require that certification bodies carrying out forest certification shall have the technical competence in forest management on its economic, social and environmental impacts, and on the forest certification criteria?	Annex 6, 3.1	<p>YES</p> <p>PEFC D 1003-1:2015</p> <p>“7.2.2 Personnel doing contract review shall possess the following competences:</p> <p>c) Knowledge of the German PEFC scheme and its requirements as well as controversial economic, ecological and social factors of forest management.</p> <p>7.3.2 Personnel granting the certification shall possess the following competences:</p> <p>a) Terminology, terms and definitions concerning forest management in Germany and the German PEFC scheme.</p> <p>b) Knowledge of the German PEFC scheme, its requirements and its evaluation; controversial economic, ecological and social factors of forest management and how they influence the compliance with certification requirements.</p> <p>c) Knowledge of the legislation relevant for forest management in Germany and the German PEFC scheme.</p> <p>7.4.2 In particular, the certification body shall ensure that the auditors:</p> <p>a) completed studies in forestry at a university or a technical college;</p> <p>b) at least two years of full-time working experience in forestry in Germany as Diplom-Forstwirt/-Forstingenieur (the preparation course for the state forest service will be recognised);</p> <p>7.4.3 The auditors shall have the following knowledge and competences:</p> <p>b) Terminology, terms and definitions concerning forest management in Germany and the German PEFC scheme</p> <p>c) The German PEFC scheme and in particular its requirements for sustainable forest management (PEFC D 1002-1) and the regional certification (PEFC D 1001).</p>



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
				<p>d) Organisational conditions of the German forest sector, with particular regard to the various types of forest ownership and property sizes, to the role of forest owners associations, to the relationship between forest enterprises, service enterprises and other societal groups in order to properly understand the terms of co-operation of the regional working group with the forest owners.</p> <p>e) Relevant national legislation and other regulations relevant to the German PEFC scheme to enable the auditor to comply with the same and to understand the legal framework in which the forest owners operate.”</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	YES	<p>PEFC D 1003-1:2015</p> <p>“7.2.2 Personnel doing contract review shall possess the following competences:</p> <p>c) Knowledge of the German PEFC scheme and its requirements</p> <p>7.3.2 Personnel granting the certification shall possess the following competences:</p> <p>a) Terminology, terms and definitions concerning forest management in Germany and the German PEFC scheme.</p> <p>b) Knowledge of the German PEFC scheme, its requirements and its evaluation</p> <p>7.4.3 The auditors shall have the following knowledge and competences:</p> <p>b) Terminology, terms and definitions concerning forest management in Germany and the German PEFC scheme</p> <p>c) The German PEFC scheme and in particular its requirements for sustainable forest management (PEFC D 1002-1) and the regional certification (PEFC D 1001).”</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	Annex 6, 3.2	YES	<p>PEFC D 1003-1:2015</p> <p>“7.4.1 The certification body shall ensure that the audit team is comprised of auditors with appropriate knowledge and competencies based on their education, training, work and auditing experience.</p> <p>7.4.2 In particular, the certification body shall ensure that the auditors:</p>



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
	related to forest management certification?			<p>c) participated in a forest certification seminar offered by PEFC Germany within the last two years;</p> <p>d) have conducted as a first qualification at least four audit days (of which three audit days were on-site) within the last three years in PEFC forest certification under guidance of an experienced auditor. To keep this qualification valid, the auditors shall conduct at least five audit days in PEFC forest certification;</p> <p>7.4.3 The auditors shall have the following knowledge and competences:</p> <p>a) Principles, procedures and methods of auditing according to ISO 19011 enabling the auditor to make appropriate use of them and to ensure that the audits are conducted in a consistent and systematic way.”</p>
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	<p>PEFC D 1003-1:2015</p> <p>“7.4.3 The auditors shall have the following knowledge and competences:</p> <p>a) Principles, procedures and methods of auditing according to ISO 19011 enabling the auditor to make appropriate use of them and to ensure that the audits are conducted in a consistent and systematic way.”</p>
7.	Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? [*1]	Annex 6, 3.2	YES	<p><i>Additional qualification requirements include competence in the German language in speaking and writing (7.4.2e) and additional detailing of forest knowledge and competence (7.4.4).</i></p>
Certification procedures				
8.	Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	YES	<p>PEFC D 1003-1:2015</p> <p>“9.1.2 The certification body shall have documented procedures for determining audit time, and for each client organisation the certification body shall determine the time needed to plan and accomplish a complete and effective audit of the client.”</p>
9.	Does the scheme documentation require that applied certification	Annex 6, 4	YES	<p>PEFC D 1003-1:2015</p> <p>“Introduction</p>



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
	procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021?			This document is based on ISO/IEC 17021:2015 and IAF (International Accreditation Forum) documents relating to the application of ISO/IEC 17021:2015. It provides additional requirements necessary for certification and auditing of sustainable forest management within the German PEFC scheme. 5.1 All requirements of clause 5 ISO/IEC 17021:2015 apply.” <i>A clause as 5.1 is repeated for each chapter, which ensures that applied certification procedures shall fulfill the requirements defined in ISO/IEC 17021:2015.</i>
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	PEFC D 1003-1:2015 “Introduction ISO/IEC 19011:2011 provides additional guidance for the auditing of management systems. 3. Normative references The following referenced documents are indispensable for the application of this document. For both dated and undated references, the latest edition of the referenced document (including any amendment) applies. • ISO 19011:2011 “Guidelines for auditing management systems” 7.4.3 The auditors shall have the following knowledge and competences: a) Principles, procedures and methods of auditing according to ISO 19011 enabling the auditor to make appropriate use of them and to ensure that the audits are conducted in a consistent and systematic way.”
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	PEFC D 4007:2015 “5.1 The notified certification body shall: c) Provide PEFC Germany, without delay, with information on every forest management and/or chain of custody certificate which is covered by the notification and /or information on any changes to already issued certificates. The range of data is specified by PEFC Germany.”



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
12.	Does the scheme documentation require that certification body shall carry out controls of PEFC logo usage if the certified entity is a PEFC logo user?	Annex 6, 4	NO	<p>PEFC D 1003-1:2015</p> <p>“9.2.2.2.2 The evaluation shall include the following tasks of the regional working group according to PEFC D 1001:</p> <p>a) Effectiveness of the participatory processes for regional certification (ch. 6, PEFC D 1001);”</p> <p>PEFC D 1001-1:2020</p> <p>“6.3.7 Where the confirmation is issued by the PEFC Germany Secretariat based on 5.3, the confirmation also provides the participant with the right to use the PEFC logo (the PEFC logo usage license), provided that the participant has signed a logo usage contract.”</p> <p>Explanation provided by PEFC Germany</p> <p>“Will be included in a revised PEFC D 1003-1 after discussion with the German Accreditation Body. The GFCC has already agreed on this change on 2nd December.”</p> <p><i>In the current versions the clauses ensure that the <u>right</u> of a group participant to use the PEFC logo is audited. However, it is insufficiently ensured that the certification body shall also carry out controls of the PEFC logo <u>usage</u>. As long as PEFC D 1003-1 is not yet updated accordingly, the nonconformity remains.</i></p>
13.	Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	NO	<p>PEFC D 1003-1:2015</p> <p>“9.1.1 All the requirements given in clause 9.1 of ISO/IEC 17021:2015 apply.</p> <p>9.3.1 The surveillance audit shall be planned and implemented to evaluate:</p> <p>a) Matters of stage 1 audits (ch. 9.2.3.1.1) where significant changes have occurred regarding the organisation of the regional working group, its documentation or the framework conditions within which the group works.”</p> <p>Explanation provided by PEFC Germany</p> <p>“The correct reference in ISO 17021 is 9.1.3.3 saying: surveillance audit at least once a calendar year, 1st surveillance audit not more than 12 months after initial</p>



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
				<p>audit. So there is only a minimal deviation between the international PEFC requirement and ISO 17021”</p> <p><i>No reference is found that the maximum period for surveillance audits shall not exceed more than one year. It shall be noted that ISO/IEC 17021:2015 (which is applicable here) requires at least once per calendar year, which still leaves room to exceed one year (12 months).</i></p> <p><i>Observation: the reference in clause 9.3.1a (“ch. 9.2.3.1.1”) does not exist.</i></p>
14.	Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	YES	<p>PEFC D 1003-1:2015</p> <p>“9.4.1 The certificates are issued for the period of five (5) years and the re-certification audit shall be conducted in the fifth year before the expiry of the validity of the certification.”</p>
15.	Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	YES	<p>PEFC D 1003-1:2015</p> <p>“8.3 The certification body shall make publicly available a summary of the surveillance audit report, including a summary of findings on the client organisation’s conformity with the forest management standard.”</p>
16.	Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	YES	<p>PEFC D 1003-1:2015</p> <p>“9.2.2.1.2 The certification body shall consider any relevant information from external bodies, such as governmental bodies, NGOs, etc. that it has received and shall use it as audit evidence to determine the client organisation conformity with the certification requirements.”</p>
17.	Does the scheme documentation include additional requirements for certification procedures? [*1]	Annex 6, 4	YES	<p><i>The procedures in PEFC D 1003:2015 further specify requirements for auditors, information, the audit and for auditing forest certification groups.</i></p>
Accreditation procedures				
18.	Does the scheme documentation require that certification bodies carrying out forest management	Annex 6, 5	YES	<p>PEFC D 1003-1:2015</p> <p>“Annex 1: Requirements for accreditation of certification bodies operating forest management certification</p>



No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	certification shall be accredited by a national accreditation body?		Certification bodies operating regional forest management certification according to the German PEFC scheme shall have valid accreditation issued by the national accreditation body of Germany (DAkkS) which complies with ISO/IEC 17011:2004.”
19.	Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5 YES	PEFC D 1003-1:2015 “9.2.3.1 The certification body issues to the regional working group a certification document that shall include at least the following information: e) Accreditation mark as prescribed by the accreditation body (including accreditation number where applicable).”
20.	Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Working Group (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	PEFC D 1003-1:2015 “Annex 1: Requirements for accreditation of certification bodies operating forest management certification Certification bodies operating regional forest management certification according to the German PEFC scheme shall have valid accreditation issued by the national accreditation body of Germany (DAkkS) which complies with ISO/IEC 17011:2004. The scope of the accreditation shall explicitly cover PEFC D 1001 and PEFC D 1002-1 in its valid version and/ or with reference to any future amendments adopted by PEFC Germany. The scope of the accreditation shall also explicitly state ISO/IEC 17021:2015, this document and other requirements against which the certification body has been assessed.” <i>It shall be noted that DAkkS is a member of IAF.</i>
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	Annex 6, 5 YES	PEFC D 1003-1:2015 “5.2 The certification body shall conduct forest certifications according to the German PEFC scheme as accredited certifications. This means it shall be accredited according to annex 1 of this standard. Annex 1: Requirements for accreditation of certification bodies operating forest management certification



No.	PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
	standard(s) shall be covered by the accreditation scope?		<p>The scope of the accreditation shall explicitly cover PEFC D 1001 and PEFC D 1002-1 in its valid version and/ or with reference to any future amendments adopted by PEFC Germany.</p> <p>The scope of the accreditation shall also explicitly state ISO/IEC 17021:2015, this document and other requirements against which the certification body has been assessed.”</p> <p><i>It shall be noted that the accreditation does not cover PEFC D 1002-2 and PEFC D 1002-3, as the scope defined in Annex 1 only refers PEFC D 1001 and PEFC 1002-1.</i></p>
22.	Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	<p>PEFC D 1003-1:2015</p> <p>“Annex 2: Requirements for notification of certification bodies operating forest management certification</p> <p>The certification body operating forest management certification against the German PEFC scheme, recognised by PEFC Germany, shall be notified by PEFC Germany.</p> <p>The notification requires that the certification body shall have a valid accreditation recognised by PEFC Germany (see annex 1).</p> <p>Conditions for granting the notification are specified in the PEFC Germany’s procedural document.”</p> <p><i>The procedures for PEFC Notification of certification bodies are further defined in PEFC D 4007:2015.</i></p>
23.	Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	<p>PEFC D 4007:2015</p> <p>“4.1.1 An entity applying for the notification shall:</p> <ul style="list-style-type: none"> a) be a legal entity; b) agree to be listed on the publicly available Internet database operated by PEFC Germany or another body, including the certification body’s identification data and / or other data as specified by PEFC Germany; c) sign a notification contract with PEFC Germany (annex 1 or 2).



No.	PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
				<p>4.2.1 Forest management certification</p> <p>4.2.1.1 An entity applying for the notification shall have valid accreditation, issued by the German accreditation body (DAkkS) that is a member of IAF (International Accreditation Forum).</p> <p>4.2.2 Chain of custody certification</p> <p>4.2.2.1 An entity applying for the notification shall have valid accreditation issued by an accreditation body that is a signatory of the Multilateral Recognition Arrangement (MLA) for product certification of IAF or IAF's Regional Accreditation Groups"</p> <p><i>No discriminatory clauses are found in the procedures.</i></p>

[*1] This is not an obligatory requirement



Annex 2 Results of Stakeholder Survey

The paragraphs below present the summarized results of the stakeholder survey conducted by the Assessor. The national stakeholder survey was held from 28 July to 11 August 2021. Form International sent out questionnaires to all stakeholders that were members of the Working Group and additional stakeholders that were invited and/or participated in public consultation meetings during the revision process.

Outcomes of the survey

General

In total 17 stakeholders responded to the request to fill-out the questionnaire:

- 8 respondents who are forest owners
- 4 respondents from business and industry
- 2 respondents from a non-governmental organization
- 1 respondent from the scientific and technological community
- 1 respondent from a workers and trade union
- 1 respondent from the government

The response rate was 17 out of 158 (11%). Respondents indicated that they represented all regions in Germany (7), or came from specific various regions in Germany, namely Hessen (3), Rheinland-Pfalz (1), Bayern (2), Baden-Württemberg (1), and the North-East (1).

Participation in the process

In total 13 respondents participated as a member of the WG; 7 respondents participated in the dialogue forum held in Berlin in June 2019; 5 respondents joined the PEFC Conference in Berlin in August 2020; and 9 participated in the online consultation (August-October 2020). 3 respondents indicated that they also participated in other ways in the process, including evaluating the work status of documents and through filling in digital formats. 2 respondents did not participate in the process, one of which noted it was not within his/her responsibilities, and another one who indicated that he/she had not been invited or received information on the process.

Participants had various interests which caused them to participate in the process:

- 6 respondents noted an environmental / sustainability interest
- 7 were interested in developing and improving the standard, most notably in a pragmatic way
- 2 respondents were interested in offering technical expertise for the development of the standards
- 1 was concerned with the rights of employees and the guarantee of fair payment

- 2 respondents were interested in the mutual recognition of the PEFC and FSC schemes

Respondents also had various concerns about the SFM standard:

- 5 respondents were concerned with the practicality of the standard and specifically with the difference between the requirements on paper and the actual situation on the ground.
- 5 respondents noted an environmental concern, particularly climate change (2) and the inclusion of hoofed game populations (3).
- 2 respondents were concerned with the situation of employees, in particular the occupational safety and their reward.
- 2 respondents listed various requirements of the standard which they were concerned with, or which they would like to see changed which are included in the table below.

All (15) respondents who had a concern stated that the organizers of the PEFC Germany standard revision process provided them an opportunity to address their concern and stated that they had been able to do so through (online) discussion, on paper, or in the WG. Nearly all (14) respondents also found they were provided with relevant documents to participate in the scheme revision. 1 respondent replied no and 1 other replied 'don't know', because he or she had not been part of the standard revision process.

Balanced representation of the Working Group

According to 11 respondents, all relevant stakeholders were actively identified invited to the process, while 2 respondents were not sure, of which 1 found this difficult to assess without access to the invitation list. 1 respondent disagreed and found that the associations BDF, HPE, VDM should have been invited. 12 respondents stated that disadvantaged stakeholders and key stakeholders were proactively invited to the standard revision process, while 5 respondents were not sure.

Most (11) respondents found that the WG had a balanced representation of the various stakeholder groups. 4 respondents disagreed, because forest owners and indigenous peoples (1 respondent) and the environment were underrepresented (1 respondent); and that there was an overrepresentation of forest owners (2 respondents). 1 respondent commented that underrepresentation of a stakeholder group was not at the fault of the organizer, but because participants need to "have to have a lot of nerve and a lot of time to participate". Respondents (10) generally found that the WG had good representation from all areas of Germany, although 1 respondent noted former West German federal states were not properly represented by forest owners, and 4 respondents were unaware of this.

Complaints

Out of all respondents 6 said there had not been complaints, 3 were not sure, 6 did not reply and 2 of the respondents noted that there had been a complaint but did not provide any details on this. Most respondents (10) did not know if complaints had



been validated and objectively evaluated, 4 said this had been the case, 3 did not reply, and 1 said no, although this respondent also indicated there had been no complaints.

The Working Group

The respondents that had been part of the Working Group (14) mostly answered positively to the questions whether:

- The WG stakeholders had relevant expertise for the subject matter of the standard;
- They received invitations for meetings and documents in a timely manner;
- All working draft documents (draft versions of the standard) had been available to all members of the WG;
- They were given meaningful opportunities to contribute to the revision of the standard and submit comments to the working drafts;
- Feedback and views submitted by any member of the WG had been considered in an open and transparent way where the outcome of these considerations was recorded;
- Feedback received during the public consultation had been considered in an objective manner by the WG;
- All working draft documents have been available to all stakeholders involved in the Forum activities;
- The decision of the WG to recommend the final draft for formal approval was taken on the basis of consensus.

Despite the general agreement on the points above, 1 respondent found that invitations and documents had not been sent in a timely manner; and for nearly each question 1 respondent replied “don’t know”. However, none of these respondents provided any further details.

Consequences to the overall assessment decision

All the above findings are further considered in the assessment of the respective topics / requirements.

(Sensitive) issues indicated by respondents

3 respondents indicated that there had been sensitive issues in the assessment, but only 1 commented on this, stating the consideration of forest damage and the focus on damage caused by game. Other respondents replied no (13 respondents) or were unsure (1 respondent). The specific comment is included in the table below, with a response of the Assessor.

Comment / Remark from Respondent	Response from the Assessor
Consideration of forest damage; Focus more on damage caused by game	Clause 4.11 of PEFC D 1002-1:2020 defines requirements for adapted game stock, to ensure regeneration of the principal tree species is possible without protective



measures. A similar requirement is found in PEFC D 1002-2:2017 (clause 4.7). Based on these requirements, the PEFC benchmark requirements (8.4.2 and 8.5.3) relating to this subject are sufficiently met.

Stakeholders that were invited for the survey

This survey was received by 158 E-mail addresses.

Category	Organisation	Name	Surname
Forest owners	Arbeitsgemeinschaft Deutscher Waldbesitzerverbände e.V., AGDW – Die Waldeigentümer	Karsten	Spinner
Forest owners	Bayerischer Waldbesitzerverband e.V.	Christian	Kaul
Forest owners	Familienbetriebe Land und Forst Bayern e. V.	Albrecht Fürst zu	Oettingen-Spielberg
Forest owners	Familienbetriebe Land und Forst e. V.	Wolfgang von	Dallwitz
Forest owners	Forstbetrieb Fürst zu Fürstenberg	Jens	Borchers
Forest owners	Forstkammer Baden-Württemberg Waldbesitzerverband e.V.	Jerg	Hilt
Forest owners	Hessischer Waldbesitzerverband e.V.	Christian	Raupach
Forest owners	Saarländischer Privatwaldbesitzerverband e.V.	Antonia	Renner
Forest owners	Schleswig-Holsteinischer Waldbesitzerverband e.V.	Caspar Graf zu	Rantzau
Forest owners	Unternehmensgruppe Fürst v. Hohenzollern	Raimund	Friderichs
Forest owners	Waldbauernverband Nordrhein-Westfalen e. V.	Dietrich Graf von	Nesselrode
Forest owners	Waldbesitzerverband Brandenburg e.V.	Carl Frhr. von	Lueninck
Forest owners	Waldbesitzerverband für Rheinland-Pfalz e.V.	Wolfgang	Schuh
Forest owners	Waldbesitzerverband Niedersachsen e.V.	Norbert	Leben
Forest owners	Gemeinsamer Forstausschuss der Bundesvereinigung der kommunalen Spitzenverbände	Norbert	Portz
Forest owners	Bayerische Staatsforsten AöR	Jan Paul	Schmidt
Forest owners	Bayerische Staatsforsten AöR	Thomas	Christen
Forest owners	Bayerische Staatsforsten AöR - Forstbetrieb Schnaittenbach	Philipp	Bahnmüller
Forest owners	Deutscher Forstwirtschaftsrat e. V.	Franz	Thoma
Forest owners	Deutscher Forstwirtschaftsrat e. V.	Georg	Schirmbeck
Forest owners	Landesbetrieb Hessen Forst	Michael	Gerst
Forest owners	Landesbetrieb Wald und Holz NRW	Andreas	Wiebe
Forest owners	Landesforst Mecklenburg-Vorpommern AöR	Peter	Kadow
Forest owners	Landesforstbetrieb Sachsen-Anhalt	Bernd	Dost
Forest owners	Landeswaldoberförsterei Peitz	Claus-Rüdiger	Seliger
Forest owners	Ministerium für Landwirtschaft und Umwelt	Hans-Joachim	Schreiber
Forest owners	Ministerium für Umwelt, Energie, Ernährung und Forsten	Jens	Jacob
Forest owners	Ministerium für Umwelt, Klima und Energiewirtschaft	Karl-Heinz	Lieber



Category	Organisation	Name	Surname
Forest owners	Ministerium für Umwelt, Landwirtschaft, Natur- und Verbraucherschutz	Rainer	Joosten
Forest owners	Niedersächsische Landesforsten	Peter	Wollborn
Forest owners	SaarForst Landesbetrieb	Hans-Albert	Letter
Forest owners	Schleswig-Holsteinische Landesforsten AöR	Christiane	Herty
Forest owners	Sparte Bundesforst der Bundesanstalt für Immobilienaufgaben	Gunther	Brinkmann
Industry	Arbeitsgemeinschaft forstwirtschaftlicher Lohnunternehmer Niedersachsen e. V.	Maurice	Strunk
Industry	Bundesverband Freiberuflicher Forstsachverständiger e.V.	Berwig	Hitzer
Industry	Bundesvereinigung des Holztransport-Gewerbes	Marco	Burkhardt
Industry	DFUV I Netzwerk der Forstunternehmen & Forsttechnik e.V.	Herbert	Körner
Industry	DFUV I Netzwerk der Forstunternehmen & Forsttechnik e.V.	Norbert	Harrer
Industry	Interessengemeinschaft Forst (IG Forst)	Alfred	Spiekermann
Industry	RAI Gütegemeinschaft Wald- und Landschaftspflege e. V.	Klaus	Wiegand
Industry	Verband der Agrargewerblichen Wirtschaft VdaW e.V.	Philipp	Polosek
Industry	Deutsche Kontrollvereinigung für forstliches Saat- und Pflanzgut e.V.	Ralf	Koether
Industry	Forum forstliches Vermehrungsgut an der Abteilung für Forstgenetik	Bernhard	Hosius
Industry	Verband Deutscher Forstbaumschulen e.V.	Alain	Paul
Industry	Zertifizierungsring für überprüfbare Forstliche Herkunft Süddeutschland e.V. (ZüF)	Gerhard	Wezel
Industry	Arbeitsgemeinschaft Rohholzverbraucher e. V.	Denny	Ohnesorge
Industry	Deutsche Säge- und Holzindustrie Bundesverband e.V. (DeSH)	Lars	Schmidt
Industry	Verband Deutscher Papierfabriken e.V.	Martin	Drews
Industry	Bundesverband Bioenergie e.V. (BBE)	Matthias	Held
Industry	Deutscher Energieholz- und Pellet-Verband e.V. (DEPV)	Martin	Bentele
Industry	Gesamtverband Deutscher Holzhandel e.V.	Katharina	Gamillscheg
NGOs	Bund für Umwelt und Naturschutz Deutschland e.V. (BUND)	Hubert	Weiger
NGOs	Deutscher Naturschutzring (DNR) e.V.	Kai	Niebert
NGOs	Deutscher Verband der Landschaftspflege e.V.	Jürgen	Metzner
NGOs	Forum Umwelt und Entwicklung	László	Maráz
NGOs	Greenpeace e. V.	Sandra	Hieke
NGOs	Klima-Bündnis der europäischen Städte mit indigenen Völkern der Regenwälder e.V.	Andreas	Kress
NGOs	Naturschutzbund Deutschland e.V.	Stefan	Adler
NGOs	Pro Regenwald	Birgit	Einhellinger
NGOs	Schutzgemeinschaft Deutscher Wald	Simon	Tangerding
NGOs	Schutzgemeinschaft Deutscher Wald, Bundesverband e. V.	Christoph	Rullmann



Category	Organisation	Name	Surname
NGOs	WWF Deutschland	Christoph	Heinrich
NGOs	Arbeitsgemeinschaft Naturgemäße Waldwirtschaft Baden-Württemberg	Franz-Josef	Risse
NGOs	Arbeitsgemeinschaft Naturgemäße Waldwirtschaft Landesgruppe Nordrhein-Westfalen e.V.	Uwe	Schölmerich
NGOs	Deutscher Jagdverband e.V. (DJV)	Astrid	Sutor
NGOs	Ökologischer Jagdverband e.V.	Elisabeth	Emmert
NGOs	Bundesverband der Verbraucherzentralen und Verbraucherverbände - Verbraucherzentrale Bundesverband e.V. (vzbv)	Klaus	Müller
NGOs	Deutscher Forstverein e.V.	Alexandra	Arnold
NGOs	Frauen im Forstbereich	Sibylle	Michels
Science	Georg-August-Universität Göttingen, Abteilung Forstökonomie und Forsteinrichtung	Bernhard	Möhring
Science	Institut für Forstnutzung und Forsttechnik - TU Dresden	Jörn	Erler
Science	TU Dresden, Institut für Forstökonomie und Forsteinrichtung	Andreas W.	Bitter
Science	TU München, Lehrstuhl für Forstpolitik und Forstgeschichte	Michael	Suda
Science	Hochschule für Forstwirtschaft Rottenburg (HFR)	Artur	Petkau
Science	Hochschule für nachhaltige Entwicklung Eberswalde	Michael	Mussong
Science	Bayerisches Amt für forstliche Saat- und Pflanzenzucht	Alwin	Janßen
Science	Forschungsanstalt für Waldökologie und Forstwirtschaft	Hans-Peter	Ehrhardt
Science	Forstliche Versuchs- und Forschungsanstalt Baden-Württemberg	Ulrich	Schraml
Science	Johann Heinrich von Thünen-Institut	Ulrich	Bick
Science	Landesanstalt für Wald und Forstwirtschaft	Herbert	Borchert
Science	Landesforstanstalt Eberswalde	D.	Murach
Science	Kuratorium für Waldarbeit und Forsttechnik e.V. (KWF)	Bernd	Heinrich
Science	Sozialversicherung für Landwirtschaft, Forsten und Gartenbau	Jochen	Baumgart
Trade unions	Bund Deutscher Forstleute	Gerd	Klötzer
Trade unions	Bund Deutscher Forstleute	Ines	Keller
Trade unions	Bund Deutscher Forstleute	Ulrich	Dohle
Trade unions	IG Metall	Wolfgang	Bonneik
Trade unions	Industriegewerkschaft Bauen-Agrar-Umwelt	Andreas	Schlegel
Trade unions	Industriegewerkschaft Bauen-Agrar-Umwelt	Harald	Schaum
Trade unions	Industriegewerkschaft Bauen-Agrar-Umwelt	Jörg	Müller
Other	AFZ Deutscher Landwirtschaftsverlag GmbH	Martin	Steinfath
Other	Bayer. Landesanstalt für Wald und Forstwirtschaft	Christoph	Schulz
Other	Bayerische Staatsforsten AöR	Jann	Oetting
Other	Bayerische Staatsforsten AöR	Silvio	Mergner
Other	Begutachtungen Wald, Holz & Biomasse	Bora	Merkschien
Other	Bundesamt für Naturschutz	Anke	Höltermann
Other	Bundesanstalt für Landwirtschaft und Ernährung	Jörg	Appel



Category	Organisation	Name	Surname
Other	Bundesforstbetrieb Lüneburger Heide - Sparte Bundesforst	Christoph	Neuser
Other	Bundesministerium für Ernährung und Landwirtschaft	Aljoscha	Requardt
Other	Bundesverband Bioenergie e.V.	Florens Hans	Dittrich
Other	Bundesverband Druck und Medien e.V.	Julia	Rohmann
Other	Bundesverband ProHolzfenster e.V.	Heinz	Blumenstein
Other	Bundesverband Waldbaden e.V.	Jörg	Meier
Other	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)	Andreas	Brede
Other	Deutscher Holz-Fertigbauverband e.V.	Joachim	Hörmann
Other	DFWR - Deutscher Forstwirtschaftsrat e.V.	Ulrich	Hardt
Other	FBG Haßberge	Birgitt	Ulrich
Other	FBG Rothaarkamm	Stefan	Richart-Willmes
Other	Forstbetrieb Ritter v. Kempster	Hubertus Ritter v.	Kempster
Other	Forstbetriebsgemeinschaft Neustadt/Aisch-Uffenheim	Helge	Schneider
Other	Forstverwaltung Trebbow	Ulrich	Ivo von Trotha
Other	FSC Arbeitsgruppe Deutschland e.V.	Elmar	Seizinger
Other	Fürstlich Wiedisches Forstamt	Gerd	Schneider
Other	Gemeinde Hohenroth	Erwin	Kruczek
Other	Gräfl. v. Bernstorff'sche Betriebe	Ralf	Abbas
Other	Gräflich Erbach-Fürstenau'sche Verwaltung	Louis Graf zu	Erbach-Fürstenau
Other	Gütegemeinschaft Wald- und Landschaftspflege e.V.	Marc	Richter
Other	hagebau Holzhandel	Tobias	Brüggemann
Other	Harald Sexl GmbH	Harald	Sexl
Other	Hess. Ministerium für Umwelt, Klimaschutz, Landwirtschaft und Verbraucherschutz	Martin	Küthe
Other	Holzbau Schmid GmbH & Co. KG	Andreas	Schembecker
Other	HolzLand GmbH	Marcus	Kretschmer
Other	Holzwerke Pröbstl GmbH	Elisabeth	Pröbstl
Other	IG BAU	Ernst-Otto	Naumann
Other	Interessengemeinschaft Zugpferde e.V.	Elmar	Stertenbrink
Other	ISOGEN	Bernhard	Dr. Hosius
Other	Jägerstiftung natur+mensch	Marc	Henrichmann
Other	Landesgemeinschaft Natur und Umwelt e.V.	Robert	Jansen
Other	LM Forst und Vermögensverwaltung GmbH und Co KG	Olaf	Legeler
Other	LWK Hannover - Forstamt Celle	Volker	Schulte
Other	LWK Niedersachsen - FA Südniedersachsen	Georg	Renner
Other	Ministerium für Klimaschutz, Umwelt, Landwirtschaft, Natur- und Verbraucherschutz des Landes Nordrhein-Westfalen	Hubert	Kaiser
Other	Nordwestdeutsche Forstliche Versuchsanstalt	Martin	Dr. Hofmann
Other	Privatforstverwaltung Brandenburg	Klaus-Otto	Künnemeyer
Other	Pro Wald und Landschaft	Peter	Fischer



Category	Organisation	Name	Surname
Other	ProHolz Bayern	Jürgen	Bauer
Other	Regierungspräsidium Freiburg	Martin	Köllner
Other	Regionale PEFC-Arbeitsgruppe Sachsen-Anhalt	Frank	Specht
Other	RWE Energiedienstleistungen GmbH	Jan	Meier
Other	Schutzgemeinschaft Deutscher Wald Landesverband Brandenburg	Christian	Eckert
Other	Staatsbetrieb Sachsenforst	Benito	Böhnisch
Other	Staatsbetrieb Sachsenforst	Bernd	Flehsig
Other	Stadt Blieskastel	Helmut	Wolf
Other	SVLFG	Klaus	Klugmann
Other	Thüringer Ministerium für Infrastruktur und Landwirtschaft	Olaf	Becker
Other	Thurn und Taxis Forst GmbH und Co. KG	Raoul	Kreienmeier
Other	UPM GmbH	Björn	Schmid
Other	Verband der Deutschen Parkettindustrie e.V.	Michael	Schmid
Other	Verband der Säge- und Holzindustrie Baden-Württemberg e.V.	Ludwig	Jäger
Other	Verband Deutscher Papierfabriken e.V. (VDP)	Martin	Waschke
Other	Verband kommunaler Unternehmen e.V. Landesgruppe Saarland	Heribert	Gisch
Other	Verbandsgemeindeverwaltung Linz am Rhein	Hans-Günter	Fischer
Other	Waldbesitzervereinigung Holzkirchen w.V.	Gerhard	Penninger
Other	Waldeckische Domänialverwaltung	Rolf	Kaufmann
Other	WG Wingshausen-Aue	Oliver	Beitzel
Other	(unknown)	Marian Frhr.von	Gravenreuth
Other	(unknown)	Matthias	Steindl
Other	(unknown)	Udo	Mauersberger



Questionnaire

Questionnaire for the revision process of the of the German PEFC standards for sustainable forest management under the German PEFC Scheme

Question to stakeholder	Answer
1. What stakeholder category do you represent?	<input type="checkbox"/> Forest owners <input type="checkbox"/> Business and industry <input type="checkbox"/> Indigenous people <input type="checkbox"/> Non-government organisations (NGO); please specify: <input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Other: <input type="checkbox"/> Scientific and technological community <input type="checkbox"/> Workers and trade unions <input type="checkbox"/> Other; please specify:
2. What region of Germany did you represent in the stakeholder consultation?	<input type="checkbox"/> Please specify:
3. Did you actively participate in the revision process of the PEFC Germany Scheme? (more than 1 answer possible) ► If no, why not?	<input type="checkbox"/> Yes, as a member of the Working Group <input type="checkbox"/> Yes, I participated in the dialogue forum held in Berlin (25 June 2019) <input type="checkbox"/> Yes, I participated in PEFC Conference in Berlin (26 August 2020) <input type="checkbox"/> Yes, I participated in the online consultation (August 2020-October 2020) <input type="checkbox"/> Yes, namely: <input type="checkbox"/> No, because:
4. What was your main interest to participate in the revision process of the PEFC Germany scheme?	Interest:
5. What, if any, was your main concern(s) regarding the Sustainable Forest Management (SFM) standard of the PEFC Germany Scheme.	Concern:



Question to stakeholder	Answer
6. Were you provided with an opportunity to address these concerns?	<input type="checkbox"/> Yes, please indicate how: <input type="checkbox"/> No, please elaborate:
7. Did the organisers provide you with relevant documents to participate in the scheme revision?	<input type="checkbox"/> Yes, because: <input type="checkbox"/> No, because: <input type="checkbox"/> I don't know:
8. In your opinion, have all stakeholders that are relevant to the objectives and scope of the standard revision process been proactively identified and invited ?	<input type="checkbox"/> Yes <input type="checkbox"/> No, other stakeholders that should have been involved: <input type="checkbox"/> I don't know
9. In your opinion, have disadvantaged stakeholders and key stakeholders been proactively identified and invited to the standard-setting activities / revision process and were any constraints to their participation addressed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, other stakeholders that should have been involved: <input type="checkbox"/> No, there were constraints to their participation: <input type="checkbox"/> I don't know
10. In your opinion, did the Working Group (WG) have a balanced representation of various stakeholder categories? (meaning no single concerned stakeholder group was dominant nor dominated)	<input type="checkbox"/> Yes <input type="checkbox"/> No, underrepresented stakeholder categories are: <input type="checkbox"/> No, overrepresented/dominant stakeholder categories are: <input type="checkbox"/> I don't know
11. Did the stakeholder representatives in the WG come from all relevant regions from your country? ► If no, which regions were not or poorly represented?	<input type="checkbox"/> Yes <input type="checkbox"/> I don't know <input type="checkbox"/> No, the following region(s) was (were) not / poorly represented:
12.a) Are you aware if any substantive and/or process complaints and appeals relating to the standard revision process were formally submitted to PEFC Germany, by you or any other stakeholder?	<input type="checkbox"/> Yes, there was a formal complaint / appeal about <input type="checkbox"/> No <input type="checkbox"/> I don't know



Question to stakeholder	Answer
b) In case of any complaints, have these complaints and appeals been validated , impartially and objectively evaluated , and is the decision communicated to the complainant?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know
13. Should we be aware of certain (sensitive) issues in our assessment of the PEFC Germany Scheme?	<input type="checkbox"/> Yes (please specify) <input type="checkbox"/> No <input type="checkbox"/> I don't know

Questions 14-21 are for Working Group (WG) members only.

If you did participate in the WG, please continue with **question 14**.

Question to stakeholder	Answer
14. Did the working group include stakeholders 1) with expertise relevant to the subject matter of the standard, 2) those affected by the standard, and 3) those that can influence implementation of the standard ?	<input type="checkbox"/> Yes <input type="checkbox"/> No, please provide an explanation: <input type="checkbox"/> I don't know
15. Did you receive invitations and documents for WG meetings in a timely manner ?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know
16. Have all working draft documents (draft versions of the standard) been available to all members of the WG?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know
17. Have you been provided with meaningful opportunities to contribute to the development or revision of the standard and to provide feedback on the working drafts?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know
18. Have feedback and views submitted by any member of the WG been considered in an open and transparent way where the outcome of these considerations is recorded?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know
19. Has all feedback received during the public consultation been considered in an objective manner by the WG?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> I don't know



Question to stakeholder	Answer
20. Was the decision of the WG to recommend the final draft for formal approval taken on the basis of consensus ? Consensus does not necessarily mean unanimity, as long as there was no sustained opposition to a substantial issue.	<input type="checkbox"/> Yes <input type="checkbox"/> No, the issue was resolved in the following way: <input type="checkbox"/> I don't know
21. In case no consensus was reached by the WG on certain issues, were these issues resolved and in which way?	<input type="checkbox"/> Yes, the issue(s) was resolved in the following way: <input type="checkbox"/> No (please explain):

Please return the answers latest by 11 August 2021. You can direct your response by
E-mail to: info@forminternational.nl

Thank you for your time and cooperation.



Annex 3 Results of International Consultation

There were no comments received during the International Consultation.



Annex 4 Internal review

There were no comments received during the internal review (only editorial comments).



