

# Introduction Standard Revision TD V

## 1. Content

1	Introduction.....	3
2	GAP analysis against new international regulations .....	3
2.1	New structure – High Level Structure .....	4
2.2	New requirements in DG 1007 Endorsement process (Process of approval and mutual recognition of national PEFC schemes).....	4
2.3	New requirements in ST 1001 Standard setting .....	6
2.4	New requirements in ST 1002 Group certification requirements.....	7
2.4.1	High level structure .....	7
2.4.2	New concepts .....	7
2.4.3	Other new requirements.....	7
2.5	New requirements in ST 1003 Sustainable forest management.....	8
2.5.1	High level structure .....	8
2.5.2	Leadership .....	8
2.5.3	Organization and context .....	8
2.5.4	Planning.....	8
2.5.5	Support.....	9
2.5.6	Forestry.....	9
2.6	(ST 1004 Operating Forest Management Certification (PEFC's requirements for certification companies for forestry certification)) .....	11
3	Comments received by the Office .....	11
4	Summary.....	12
	HLS appendix ISO 14001 vs PEFC 1002:2018 group forest management .....	14
	Conclusions for Sweden .....	16

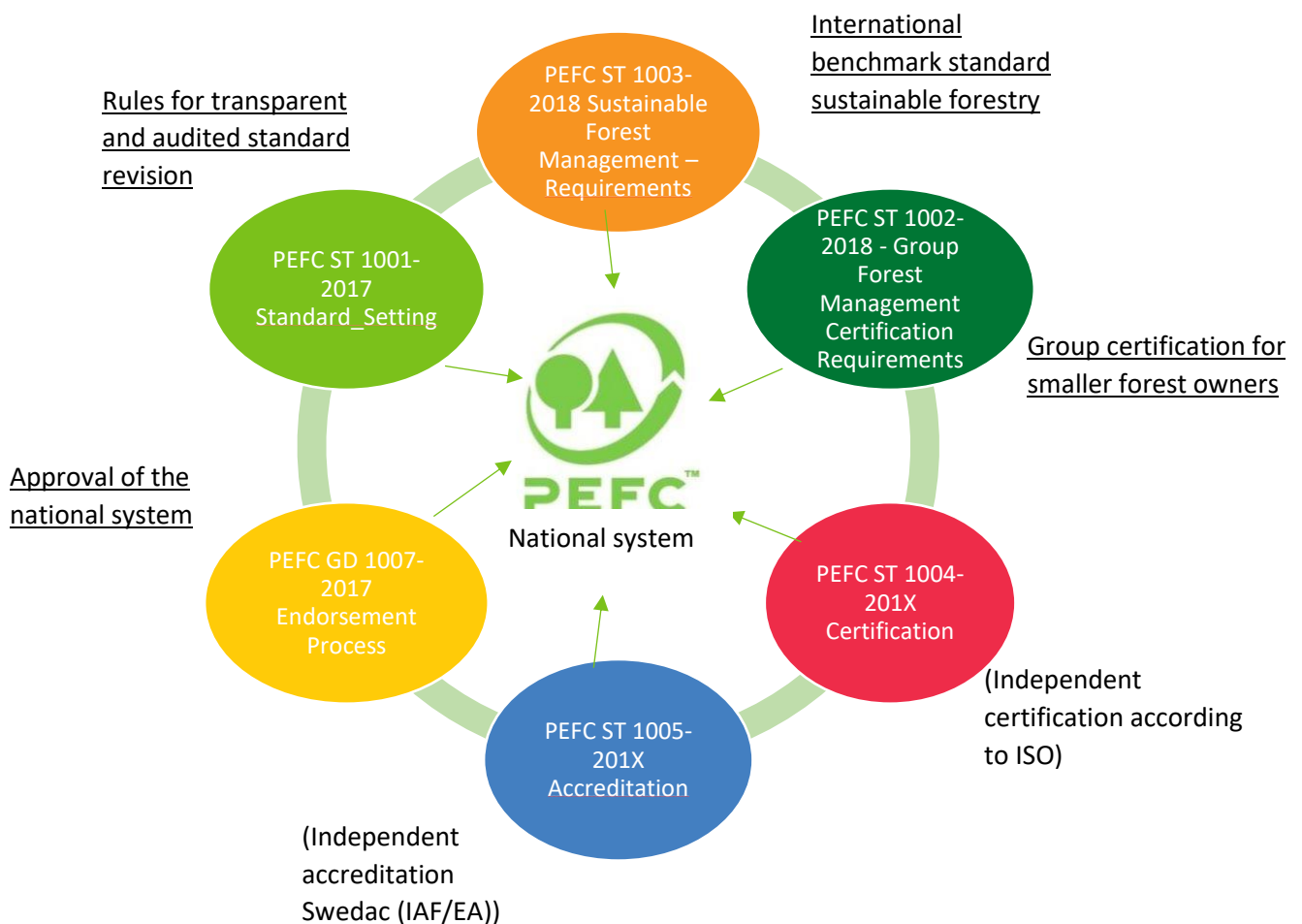


## 1 Introduction

PEFC Sweden must initiate review/revision of the Swedish national forest standard (PEFC TD IV document 001-005) before 20 April 2021. New international standards for standard setting, group certification and sustainable forest management mean that our process and standards need to be reviewed to ensure that we meet the new requirements. In many cases, these are things that we already have in place in the Swedish standard and / or in Swedish praxis. Other requirements are new to us and must somehow be addressed in a revision. The purpose of this document is to identify the requirements that are new in the international regulatory framework and to evaluate whether adaptation is needed. The document also summarizes the views on the standard and standard revision process received by the office from existing and new stakeholders. Finally, a plan is proposed for further work in 2020.

## 2 GAP analysis against new international standards

All national PEFC systems must meet the commonly agreed global standards (Iam illustrated in the image below. Those that are underlined are those that are recently revised and relevant to our standard revision. )



## 2.1 New structure – High Level Structure

The new standards for forestry certification and group certification are structured according to ISO's high level structure principles, making them easier to integrate with other standards (ISO). The standards are structured according to the following structure:

- Scope
- Normative references
- Terms and definitions
- Context of the organization,
- Leadership
- Planning
- Support
- Operations
- Performance evaluation and
- Improvements.

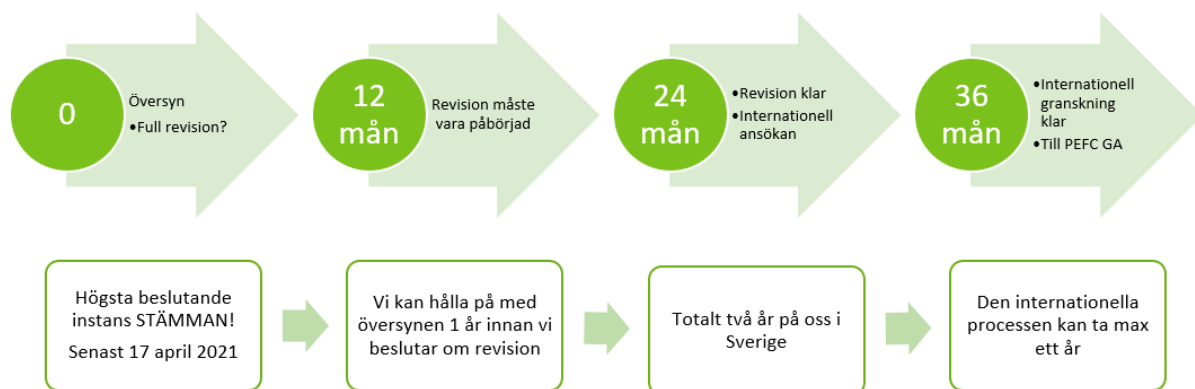
This implies some requirements of a management system nature. This is in practice not particularly new for us but we will have to show that it is covered in the current system and in some cases make additions. Sometimes the requirements are pure repetitions of the management system requirements in e.g. ISO 14001, but sometimes some chapters are PEFC-adapted, which makes the adaptation a little more difficult.

## 2.2 New requirements in ST 1007 Endorsement process (Process of approval and mutual recognition of national PEFC schemes)

*This document regulates how PEFC systems are reviewed and approved. This guide has been developed, especially with regard to completely new systems that are being reviewed for the first time, which is not applicable to PEFC Sweden. However, it can be good to know about, in light of PEFC Sweden's desire for increased quality in all parts of PEFC.*

The document introduces a new model for the approval of a national system: Previously, our standard and we as a national governing body were approved for five years at a time and each version of the standard had an expiration date. Now the approval of the system is considered ongoing as long as we manage our national system in accordance with the rules and milestones that have been set. A non-compliant system may be withdrawn or terminated (after warning).

The date of commencement of review is defined as the date of national approval (PEFC Sweden approval) + 5 years. In our case, April 20, 2016 + 5 years=**April 20, 2021**. One can start earlier but then officially starts the countdown of the total 2 years we have at our disposal to complete the process:



Depending on the nature of the review/revision of the national system, there are also variants of the international review (6.3):

1. Review of new system (6.3.1)
2. Review of a revised system (6.3.2)
3. Review of a system to be reconfirmed (6.3.3)
4. Review of changes (made between regulatory review/revision) (6.3.4)
5. Checking editorial changes (6.3.5)

Since we will need to make at least some changes to meet the international standard, our review will be of a revised system (point 2). This can be done in two ways:

1. Review of the entire standard / system including review of contracts for logo licenses, notifications, etc .
2. Review of changes made:
  - a. Review of our changes against applicable parts of PEFC's international reference standards
  - b. Review against changes in PEFC international reference standards since the last time the system was revised
  - c. Comparisons between previous versions of the national system to exclude unreported changes.

As a national body, we can apply for a review of the changes made (option 2).

A transitional period of a maximum of one year for the new standard shall be established (PEFC ST 1001: 2017, 9.4)

## 2.3 New requirements in ST 1001 Standard setting

*This document deals with how national standards are to be developed, reviewed and revised in the PEFC system. The main focus of the revision of this document has been to align it with the requirements of the ISEAL Code of good practice for setting social and environmental standards.*

This is a summary of the new requirements that are judged to have bearing on the Swedish system and which require additions to PEFC SWE 001 *Appendix D Swedish procedure for the preparation of PEFC forest standards*.

Information about the purpose, scope, different steps of the process and the schedule must be a public document and must be included in the notice of the standard revision (6.3.1)

The nine different stakeholder groups identified in Agenda 21 will be taken into account in the stakeholder mapping. (6.2) . At a minimum, the following should be included:

- Forest owners
- Business
- Indigenous people
- NGOs
- Technology and science society
- Workers and trade unions

The standard revision and the formation of working groups shall seek gender balance (4. , 6.4.1)

More explicit requirements for the standard owner to make an effort to get attendees from key stakeholder groups. A goal for participation shall be determined (6.4.3.)

A recommendation to use the public consultation to resolve disagreements "disputes" in the standard revision (6.4.7(c).

Some updates regarding publication, availability, language and date need to be made in the Swedish document (7.2).

The report describing the standard revision shall be publicly available (7.4.2.)

A permanent feedback point for views on the standard, accessible on the website, shall be created (8.2.1)

All feedback from meetings, trainings, etc. shall be documented and used as a basis for the revision work (8.2.2).

A gap analysis shall be performed (8.3.1)

The standard owner shall take into account the latest research studies, knowledge and relevant current issues (8.3.2).

These requirements should be fully possible to work into the Swedish procedure. The revised version is then proposed as the basis for the next standard revision process. During the standard revision, stakeholders should also be given the opportunity to comment on the procedure and modify it (as long as the requirements of the international regulatory framework are met).

## 2.4 New requirements in ST 1002 Group certification requirements

*This document contains the requirements for the group certification standards of the national systems.*

### 2.4.1 High level structure

The management system perspective is reinforced and structured according to the ISO structure. The Swedish standard, to a large extent handles this already now, either in the standard (PEFC SWE 004), or via the requirement for ISO 14001. However, we have an opportunity to develop the PEFC standard so that the requirement for ISO 14001 can be taken out if desired.

### 2.4.2 New concepts

Examples of additional requirements: In addition to monitoring requirements, there are requirements for internal auditing. We have both concepts in the Swedish system but need to review the language. The concepts of "group management plan" and "group management system" have also been introduced.

### 2.4.3 Other new requirements

4.4.2 If a group member trades in timber outside the group certificate, he or she must be covered by a certificate of chain of custody. In Sweden, we already have harvesting organization as a concept in the standard.

5.1.1. e, (5.1.2.a) group member who has been excluded cannot apply/be admitted again until after 12 months in any PEFC umbrella. New internal audit of the member is required for re-entry (10.1.3). New and must be taken into account.

The group member is obliged to inform the umbrella organization about membership in another group certificate (5.1.2 b) and about any eventual deviations identified there (5.1.2 e). New and must be taken into account.

Requirements that you intend to meet at group level should be included in the "group management plan" (6.2). This is a clarification of the possibility of meeting requirements at the group level. The Swedish standard revision process can (and should?) control whether and how this should be possible in the Swedish system.

The framework for internal audit is developed with, for example proposed criteria for selection categories and developed instructions for samples. Some formulations may need to be updated/expressed more explicitly in the Swedish standard. These are not expected to be any major changes.

## 2.5 New requirements in ST 1003 Sustainable forest management

*This document is the PEFC's benchmark standard for forestry and regulates which elements and requirements must be included in a national forest standard within PEFC.*

### 2.5.1 High level structure

The high-level structure entails some requirements of a management system nature in the document, which is partly new. In Sweden, we have basic requirements for management systems according to Appendix 2 PEFC SWE 004 that must be reviewed and adapted.

### 2.5.2 Leadership

The organization must formulate a commitment to comply with the standard and other requirements and to work for continuous improvement in its management system. This should be publicly available. (5.1, 5.2). Additions are required.

### 2.5.3 Organization and context

New elements that handle claims from forest owners covered by a PEFC certificate (4.1. e-h) to ensure that only correct claims are made. This must be added to the Swedish standard.

The organization shall determine which stakeholders in sustainable forestry are relevant to the organization and what expectations and needs they have. This probably requires a form of addition to the Swedish standard.

### 2.5.4 Planning

The organisation shall consider risks (and opportunities) with regard to sustainable forest management. New and needs to be added.

The organization must have access to relevant legislation and must comply with it, the standard specifically mentions anti-corruption legislation (6.3.1.1, 6.3.1.2) and that human rights must be respected (6.3.2.3). Partially new and may require light modification.

New requirement that working hours and leave must be in line with legislation or collective agreements (6.3.4.2) IN PEFC SWE 002 4.5.2 refers to the provisions of collective agreements as a basis.

More explicitly stated that wages should be in line with the minimum level or collective agreement (6.3.4.3) In pefc swe 002 4.5.2, reference is made to the provisions of collective agreements as a basis.

The organization shall work for gender equality equal opportunities, non-discrimination and counteract harassment (6.3.4.3) In PEFCS SWE 002 there is § 4.9 on gender equality and equality.

Forest management plans should take into account scientific evidence (previous forestry should take scientific evidence) (6.2.6) This may require a duty statement somewhere.



### 2.5.5 Support

Complaint mechanism for complaints regarding forestry, land rights and working conditions is required by the organization (7.4) (formerly between forest actors and local residents). The current mechanism of the Swedish standard should be good enough as we cover all parts of the standard.

### 2.5.6 Forestry

#### 2.5.6.1 Climate

The paragraph on forest management has been supplemented by a requirement concerning the ability of forests to store and absorb carbon in the medium and long term (8.1.2). This is new and requires action (can probably be linked to some of our formulation about long-term production capacity if we want to).

The standard requires that the climate issue be taken into account in forestry by , for example, reducing greenhouse gas emissions and efficient use of resources. (8.1.3) This is completely new and probably requires some kind of addition.

Regarding the protection functions of the forest (8. 5.1), climate and carbon dioxide emissions have also been included.

"---**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. ---"

(Also note that the concept of *ecosystem service* is mentioned)

#### 2.5.6.2 "Ecologically important forest areas" (3. 5)

This is identified as a reinforcement of the concept used within PEFC for ecologically important forests. The term is then used in a series of requirement elements.

#### "---**3.5 Ecologically important forest areas**

Forest areas

- a) Containing ~~(significant concentrations of)~~ protected, rare, sensitive or representative forest ecosystems ~~(such as riparian areas and wetland biotopes);~~
- b) Containing significant concentrations of endemic species and habitats of threatened species, as defined in recognised reference lists;
- c) Containing endangered or protected genetic in situ resources; ~~(and taking into account)~~
- d) **Contributing** to globally, regionally and nationally significant large landscapes with natural distribution and abundance of naturally occurring species. ---"

"Ecologically important forest areas" is used in 8.1.4., conversion of forest land which is modified as follows:

---**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;
- b) entails a small proportion (no greater than 5 %) of Forest type within the Certified Area;
- c) does not have negative impacts on threatened (including vulnerable, rare or endangered) forest ecosystems, Ecologically Important Forest areas; culturally and socially significant areas, or other protected areas;
- d) does not destroy areas of significantly high carbon stock;
- e) makes a contribution to long-term conservation, economic, and social benefits. ---"

For the Swedish standard, it is probably the wording "5% of the current forest type within the certified area" that may require an action.

"Ecologically important forest areas" is also used in 8.4.2. :

---**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.  
*Note:* This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes. ---"

However, this is not really considered to affect the PEFC Sweden system's management, which consists of a number of requirement elements, e.g. provisions, nature value assessment before action, reinforced consideration, etc. that together meet / handle the international requirement.

Other requirements that contain the concept are:

- no reforestation or afforestation of ecologically important non forest areas (8.1.5) and
- conversion of degraded forests to plantations encouraged subject to strict conditions (8.1.6)

which are not considered to be relevant in Sweden.

#### 2.5.6.3 Other requirements

New requirement for documentation of use of pesticides (8.2.7); In the Swedish standard, we now have a ban, so this should not have to be written in. On the other hand, the paragraph on chemical control must be updated to the ban that has now been decided.

The use of knowledge from voluntary organizations, indigenous peoples, local communities and has been expanded with a writing about the correct sharing of the benefits of the information. (8.6.5) This is less relevant in Sweden and therefore a bit tricky to relate to, but perhaps you can simply record a discussion about this and avoid burdening the standard with fluff paragraphs.

New requirement for monitoring of working conditions and taking the necessary measures in case of deficiencies. (9.1.5). I PEFC SWE 002: 4.8 "Work environment" 4.8.1 SAM – should cover this?

### 2.6 ST 1004 Operating Forest Management Certification (PEFC's requirements for certification companies for forestry certification))

This standard has not yet been finalized and we do not yet know when/if this will happen. There is a draft from 2014 that the Swedish stakeholders were not very happy with. We can see this as an opportunity to take a proactive approach to the issue. (Magnus Norrby is a Nordic delegate in the international working group that is also responsible for the group certification standard)

## 3 Comments received by the Office

A brief summary of comments received through various actors who have contacted us and we have their own participation in meetings, etc.:

- When is a certified contractor needed? (NGOs, sports clubs)
- Pension insurance
- Financial statements for sole traders?
- Sweden association for working horses in the forest
  - Want to be seen in the standard
  - Want to add basic requirements for animal husbandry (according to industry standards)
- What about site work instructions when it never gets better?
- Mark the words that PEFC has a definition for – many miss the definitions in document 001
- Competence-
- The interfaces between contractor – logging organization – forest owner
- The standard for the certification companies
- Issuing certificates – the fee model
- Audit governance – should scope, time or otherwise be specified?
- Issued certificates – clarify the different actors in the system (from the harvesting organization) for better transparency and clarity (and a better basis for fees)
- Building conservationists/wood industry
- Dense timber from older trees is in demand for church repairs et.c. – ends up in set- asides and as retention trees

- Comparisons with Finland-Norway – do we have higher requirements in Sweden and thus poorer competitiveness when everything is sold as PEFC?

## 4 Summary

This preliminary GAP analysis against new standard requirements mainly echoes two questions of a slightly more pervasive nature: High Level Structure with management system requirements and those relating to climate, carbon sequestration and greenhouse gases.

The management system requirements are sometimes repetitions of the requirements of e.g. ISO 14001, but sometimes they are more PEFC-adapted. One can think of a few different ways to deal with this. One option is that we continue to refer to ISO 14001 for group certified and supplement the requirements for management systems for direct certified (Appendix 2 in PEFC SWE 004) while striving to make as few interventions in other standard parts as possible. Even for those with 14001 certificates, adaptations are required and these could be put in a new appendix. Another option is to integrate as many of the requirements as possible into the standard and move towards a more HLS structure. There is also an option here to remove the requirement for ISO 14001 if desired.

With regard to the requirements added regarding climate, carbon sequestration and greenhouse gases, there is an opportunity to handle the requirements for some of the elements with minor adaptations. It is however in line with previous strategy discussions to highlight the climate issue as one of the areas that the PEFC revision should focus on.

The views received by the office in general are to a large extent about issues related to the contractor standard and / or the social standard. This means that the contractor standard must be a focus area for the revision. In addition, a need to review the rules for certification companies has been identified.

Proposals for further work in 2020:

- The board discusses how to manage:
  - HLS and management system requirements
  - The issue of climate, carbon sequestration and greenhouse gases
- GAP analysis completed
- The Secretariat modifies Appendix D Swedish procedure for the preparation of PEFC forest standard in PEFC SWE 001. (Taking into account this GAP analysis and comments received)
- Stakeholder mapping planned – discussion in the Guidelines on a strategy in the autumn
- A proposal for the scope of the standard revision is established before the end of the year – comments are continuously received
- A mission statement for staffing the standard revision office is produced as a basis for a procurement (early autumn)

In addition to the discussion points raised above, the Board should also take a position on whether the following proposals for direction (which were discussed at the Board meeting 2020-03-17) continue to be a good approach:

- Identified deviations from the new international standards and input from members shall provide the basis for a proposal for the scope and direction of the standard revision. When the invitation is made, it must be possible, linked to the registration, to raise other issues as well.

## HLS appendix ISO 14001 vs PEFC 1002:2018 group forest management

This section compares the additional management system requirements of the new PEFC group certification benchmark standard with ISO 14001. PEFC wording in bold.

### 4.1. 14001: Context of the organisation/PEFC: understanding the group organisation and its context

Specifies relevant issues of the PEFC **group organisation**.

### 4.2 14001: Understanding the needs and expectations of interested parties/PEFC: affected stakeholders

**Affected stakeholders** rather than interested parties.

### 4.3 14001: Determining the scope of the environmental management system/PEFC: group management system

The organization/**standard** shall define...

Organisational units, physical borders/**group organisation, group entity, participant, area**

**Scope and boundaries of group management system**

**The standard shall define which elements that may be fulfilled on group level**

### 4.4 14001: Environment management system /PEFC: Group management system

PEFC specific requirements.

### 5.1 Leadership and commitment (both)

PEFC specific requirements for **group entities** and **participants**. Need to be included anyway and only a few are new for us.

### 5.2 14001: Environmental policy/PEFC: Commitment and policy

**No environmental policy in the PEFC standard.**

The group **entity** shall provide a commitment to include the group **certification requirements** in the group management system, continuously **improve the group management system**, to continuously support the improvement of the **sustainable management of the land/forests by the participants** => policy publicly available on request.

#### **Commitment by participants.**

### 6. Planning (both)

A very short chapter in PEFC compared with 14001.

6.1. & 6.2 PEFC specific requirements on group management **system** and group **management plan** and possible **fulfilment on group level**.

### 7. Support (both)

7.1 Resources - possibly OK with reference to ISO 14001, texts are quite similar

7.2 Competence – probably OK to reference ISO 14001 but simpler and more to the point in the PEFC std

#### **7.3 ISO 14001: Awareness / PEFC: no title**

**PEFC specific implementation – focus on awareness of participants rather than awareness of staff**

7.4. ISO 14001: Communication/ PEFC: no title

PEFC specific implementation which is more specific and a bit simpler than 14001.

**PEFC 7.5 deals with complaints, in ISO 14001 this is included in 7.4 communication.**

7.5 14001: Documented information/ PEFC: 7.6

PEFC is simplified and a lot shorter but ISO 14001 should be OK.

### 8. Operation (both)

#### 8.1 14001: Operational planning and control/ PEFC 8.1 and 8.2

PEFC is a lot shorter more to the point and there is no mention of LCA (life cycle analysis) or environmental requirements.

#### 8.2 14001: Emergency preparedness and response/

No corresponding clause in PEFC ST 1002.

### 9. Performance evaluation (both)

9.1 Monitoring, measurement, analysis and evaluation (both)

Very similar requirements, the PEFC standard specifies that it is the conformity of the group **organisation** which shall be monitored and that is the group **entity** which shall evaluate the group management performance and the effectiveness of the **group management system**.

#### 9.2 Internal audit (both)

Tailored to PEFC with specifications on audits of **group entity and participants**.

#### **9.3 PEFC Specific requirements on selection of participants in the internal audit programme**

Very much in line with our procedures.

#### 9.3 ISO 14001: Management review/PEFC: 9.4 Management review

PEFC specific requirements of the management review.

#### 10. Improvement (both)

Very similar to ISO 14001 but slightly PEFC adapted. May need some additional wording in the Swedish standard.

## Conclusions for Sweden

The HLS/management systems requirements will not affect the *implementation* of PEFC in Sweden dramatically since we already put a lot of emphasis on management systems in our forest standards (ISO 14001 for groups and management system requirements according to PEFC SWE 004 Appendix 2). There will however be a need to include many of the HLS/management system-requirements from the benchmark standards in the Swedish national forest standard to fully match the PEFC implemented wordings. Simply referring to ISO 14001 will not suffice. This could be done in an appendix.

For direct certification the management system requirements of reference standard PEFC ST 1003 apply – some minor additions are needed to the existing management system requirements already in place (PEFC SWE 004 appendix 2).



