

PEFC Council

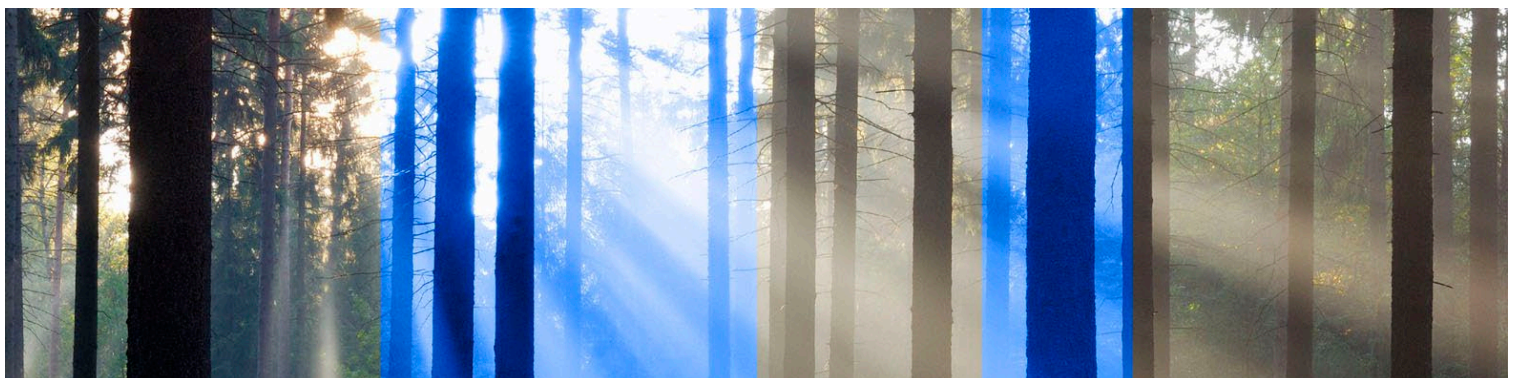
**Conformity Assessment of the Revised China Forest  
Certification Scheme Against the PEFC Council Requirements**

*Final Report v.2*

*Indufor Oy, Helsinki*

Helsinki, Finland  
August 15, 2022

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## ABBREVIATIONS

CCAA	China National Certification Accreditation Authority
CFCC	China Forest Certification Council
CFCS	China Forest Certification Scheme
CFCS GM	CFCS Group Forest Management Requirements
COC	Chain of custody
CNAS	China National Accreditation Service for Conformity Assessment
DRC	Dispute Resolution Committee
FMR	Forest Management Requirements of the CFCS
GM	Group Forest Management
ILO	International Labour Organisation
PEFC	Programme for the Endorsement of Forest Certification
SDPR	Standard Development Process and Records of the CFCS
SDR	Standard Development Rule of the CFCS
SFM	Sustainable forest management
TOF	Trees outside forests



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## 1. INTRODUCTION

### Background

The national governing body for the national China Forest Certification Scheme (CFCS) is China Forest Certification Council (CFCC). CFCC has been a member of the PEFC Council since 2011. The CFCS was first endorsed by PEFC Council in 2014 and CFCC started the revision of the scheme in November 2019, within the five-year timeframe defined by PEFC Council for scheme revisions. Since PEFC Council revised its benchmark standards for sustainable forest management in 2018 and by 2020 for standard development and chain of custody certification, the endorsement assessment was launched by the PEFC Council only in early 2021.

CFCS is a broad national scheme that includes requirements for management of forests and group certification, as well as trees outside forest, non-timber forest products and bamboo forests. In addition, it has its chain of custody standard and CFCS trademark. The scope of PEFC endorsement includes management of forests<sup>1</sup> (SFM), group forest management (GM), chain of custody (COC) and the PEFC trademark. Therefore, the CFCS standards on trees outside forest, non-timber forest products and bamboo forests were not a part of this assessment.

The draft report of this assessment, delivered to the PEFC Council on August 28, 2021, included a large number of non-conformities. Subsequently, the PEFC Council and the CFCC decided on an interruption of the assessment process for the revision of the CFCS documentation. The continuation of the conformity assessment was split into two stages:

- Stage 1 included the conformity assessment of the procedures stipulated in the updated standard-setting requirements of the CFCS, issued on October 20, 2021. Stage 1 was completed in December 2021.
- Stage 2 included CFCC carrying out a time-critical revision of the rest of the CFCS technical documentation (SFM, GM, COC) and submitting it for conformity assessment during 2022. The CFCS documentation was submitted for conformity assessment in January 2022.

### Scope of this report

This final draft report on the *Conformity Assessment of the Revised China Forest Certification Scheme Against the PEFC Council Requirements* was delivered to the PEFC Council and CFCC on April 29, 2022. The final draft report takes into consideration the updated standard-setting requirements of the CFCS as well as the revision of the rest of the CFCS technical documentation (SFM, GM, COC). The report was submitted to the PEFC Technical Unit to implement the internal review process and completed as a final assessment report after receiving the internal review comments from the PEFC Technical Unit.

The structure of this report is following:

Chapter 1 gives an introduction to the assessment work.

Chapter 2 provides a recommendation on the endorsement to the PEFC Board of Directors and specifies possible conditions the Board should take into consideration in the decision-making.

Chapter 3 includes a summary of findings which presents the conclusions on the compliance of

- standard-setting procedures and process implemented,
- forest management standard
- group certification arrangements
- chain of custody certification and control of logo use
- complaints and dispute resolution procedures and

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<sup>1</sup> CFCS documentation on Trees Outside Forests and Non Timber Forest Products was during the interruption of the assessment process excluded from the PEFC assessment for endorsement.

- certification and accreditation procedures with the requirements of the PEFC Council.

Chapter 4 describes the material and methods of the assessment, i.e., the CFCS documentation used and the PEFC Council documents providing the reference in conformity evaluation. Data collection methods, as well as principles used for grading conclusions, are also described.

Chapter 5 presents the governance structure of the China Forest Certification Scheme and the organisations involved in its implementation.

Chapter 6 provides a detailed assessment of the standard-setting procedures and process against the requirements of the PEFC Council.

Chapter 7 provides the conformity assessment of the forest management standard with the requirements of the PEFC Council.

Chapter 8 includes an assessment of the CFCS group certification arrangements and their compliance with the requirements of the PEFC Council.

Chapter 9 reviews the compliance of the chain of custody certification standard with the PEFC Council requirements

Chapter 10 reviews the compliance of the rules for PEFC logo use with the PEFC Council requirements

Chapter 11 gives a detailed analysis of the certification and accreditation arrangements

Chapter 12 gives a detailed analysis of CFCS complaints and dispute resolution procedures and their compliance with PEFC Council requirements.

Chapter 13 summarizes the comments received in the international and national consultation.

## **2. RECOMMENDATION**

Indufor recommends that the PEFC Council **endorses** the revised China Forest Certification Scheme (CFCS) under the condition that the Scheme is improved within the given time period to resolve the eight (8) minor non-conformities in the standard setting procedures and process, the sustainable forest management standard, the COC standard and the certification and accreditation arrangements. The minor non-conformities and comments are described in chapter 3 (Summary of the Findings).



### **3. SUMMARY OF THE FINDINGS**

#### **3.1 Structure of the China Forest Certification Scheme**

The China Forest Certification Scheme (CFCS) is governed by the China Forest Certification Council (CFCC). CFCC secretariat is responsible for the daily management of the Scheme. CFCC is a member organisation (with 23 members) representing social, environmental and economic interests. CFCC bylaws are described in Part I Scheme Description and Implementation Arrangements, Annex I.

The standard setting is organised by CFCC which delegates the mandate to working groups whose members CFCC invites in an open process and nominates to expert and stakeholder working groups.

CFCC has also the responsibility to arrange notification of independent certification bodies eligible for forest management and chain of custody certification in the Scheme.

No significant changes to the CFCS administration have been applied since the first endorsement.

#### **3.2 Standard-setting procedures and process**

The revised standard-setting procedures of the CFCS are described in the Standard Development Rule (SDR), issued on April 20, 2022. The document is the equivalent of the PEFC ST 1001:2017. The implemented standard-setting process is mainly described in the Standard Development Process and Records (SPDR), issued on January 13, 2022.

The SDR was updated and re-issued by the CFCC multiple times during the assessment to fix identified non-conformities. This report concerns the latest version of the SDR from April 20, 2022. Large sections of this latest SDR version are identical to the PEFC ST 1001:2017.

The standard-setting process assessed in this report was a time-critical revision of standards, instructed by the PEFC International on December 7, 2021. The implication of this was that a lot of the normal requirements for the standard-setting process were not applicable.

The assessment resulted in two non-conformities:

- **A minor non-conformity** results from omission of the description of the standardising body's legal status in the SDR (benchmark 5.1.1 a).
- **A minor non-conformity** remains in the process required by the PEFC ST 1001:2017 benchmark 7.2.4: a summary of major changes and their justification for revised standards (part of the development report as defined by the PEFC GD 1007) has not been made publicly available.

#### **Comments:**

- It is recommended that the feedback received during the standard implementation is reported explicitly by the standardizing body in the future revision rounds. (Benchmark 8.1)
- It is recommended that the appropriate decision-making level (i.e., the body responsible for the process) is defined in the SDR. (Benchmark 9.3.3 c)

The assessment concludes that the standard-setting procedures and process **comply** with the PEFC requirements, given that the remaining minor non-conformities are addressed as required.

#### **3.3 Sustainable forest management standard**

The sustainable forest management requirements of the CFCS are described in the Forest Management Requirements (FMR). The document is the equivalent of the PEFC ST 1003:2018.

The latest version of this document was issued on April 20, 2022, with revisions of non-conformities included in the previous versions of the document and highlighted during the assessment. The first assessment round of the CFCS sustainable forest management requirements in August 2021 yielded a total of 35 non-conformities.

The general structure of the revised FMR differs from that of the PEFC ST 1003:2018, while some of the individual requirements are identical between the two documents.

The assessment resulted in one non-conformity:

- **Minor non-conformity** results from the lack of reference whether WHO class 1A and 1B pesticides are prohibited by the national laws and regulations, and thus by the standard (benchmark 8.2.8)

### Comments

The following comments do not reflect a non-conformity since the requirements of the benchmark have been interpreted to be technically fulfilled in each individual case. The recommendations featured in the comments would, however, strengthen the language of the standard and reduce any potential ambiguity in its practical interpretation.

- It is recommended that the requirement to include a description of the current forest management unit in the forest management plan be made explicit in the FMR. It is also recommended that the language of the FMR is revised so that it explicitly requires the listed contents to be included in forest management plans. (Benchmark 6.2.3)
- It is recommended that the requirements to commit to freedom from workplace harassment and to promote gender equality are made explicit in the FMR. (Benchmark 6.3.4.4)
- It is recommended that the requirement for successful regeneration is made explicit in the FRM. (Benchmark 8.4.4)
- It is recommended that the requirement for regular monitoring of working conditions is made explicit in the FMR. (Benchmark 9.1.4)

The assessment identified one minor non-conformity between the FMR and the PEFC ST 1003:2018. Therefore, the FMR **complies** with the PEFC requirements, given that the remaining minor non-conformity is adequately addressed.

## 3.4 Group forest certification model

The assessment of the CFCS group forest management standard (“Guidelines on Group Forest Management Certification”) against PEFC ST 1002:2018, in August 2021, resulted in a total of 60 non-conformities and a conclusion that the CFCS standard on group forest management does not comply with the PEFC requirements. CFCC and PEFC mutually decided to interrupt the assessment process to allow for up-dating relevant standards. The updated CFCS standard on group certification, the “Group Forest Management Requirements” was submitted for assessment on January 15, 2022.

The CFCS GM is with regards to both structure and contents largely identical to the PEFC ST 1002:2018. Hence, there are considerable changes in the CFCS GM as compared to the previous version (i.e., the “Guidelines on Group Forest Management Certification”).

The assessment of the Group Forest Management Requirements against the PEFC ST 1002:2018 found no non-conformities. Therefore, the CFCS GM **comply** with the PEFC requirements (PEFC 1002:2018).

## 3.5 Chain of custody standard

The CFCS describes the requirements for chain of custody certification in its document “Chain of Custody requirements” (hereafter referred to as CFCS-COC, or CFCC 2002:2020 standard). CFCC approved the final version of the standard in April 2022.

The CFCS-COC standard is based on the international PEFC chain of custody standard (PEFC ST 2002:2020). CFCC has replaced references to PEFC with references to corresponding CFCC standards or rules.

CFCC has also modified some PEFC requirements that refer. e.g., to ILO Declarations<sup>2</sup> or to international organisations not recognized in China (e.g., Transparency International)<sup>3</sup>. The CFCS-COC requirements for chain of custody systems and due diligence procedures are fully in line with the PEFC COC standard but being a scheme specific COC standard, it lacks elements that ensure controlled transfer of certified fiber between the PEFC and CFCS. The scheme specific COC standard should specify the flow of material and claims between the PEFC and CFCS-COC certified and labelled operators. These requirements are implicitly required by the PEFC COC standard when it is operated with a scheme specific COC standard.

The assessment identified four minor non-conformities between the CFCC COC-2002:2022 and PEFC 2002:2020 standards:

- **Minor non-conformity** PEFC ST 2002; 5.1.2.1: CFCS requires verification of certification status of all certified inputs of CFCC mutually recognised forest certification schemes. CFCC shall specify in the context of PEFC endorsable COC system, what are these certification schemes. CFCS scheme includes certification programs that are not endorsed by PEFC and there is a risk that fiber e.g., from such programs may enter into PEFC COC as PEFC certified. The specification is important to ensure that material entering the CFCS COC is acceptable in terms of PEFC COC requirements and claim. CFCS has compatible procedures to ensure that material from controversial sources does not enter the system.
- **Minor non-conformity** PEFC ST 2002; 5.1.2.2: CFCS does not define how materials and claims entering from CFCS COC system to PEFC COC system are classified and how claims are transferred between the schemes. This is a provision that emerges from the operational implementation of scheme specific COC standards.
- **Minor non-conformity** PEFC ST 2002; 5.2.1: CFCS does not define how the output of materials and claims between the CFCS COC and PEFC COC systems are classified and how claims are transferred between the schemes (cf. previous NC on inputs). CFCS COC standard shall be more specific in defining the flow of certified fiber between PEFC and CFCS COC certified sources. In addition, CFCS shall require that products have PEFC official claims when they are entering into the production of a PEFC COC certified company (cf. cf. PEFC ST 2002 3.24 definition for certified material).
- **Minor non-conformity** PEFC ST 2002; 5.3.1: The CFCS implementation arrangements define that the use of PEFC logo on CFCS certified products shall comply with the PEFC ST 2001:2020. However, this requirement is not clearly stated in the CFCS COC or labelling rules.
- **Summary of the Comment (ref. 4.10 PEFC ST 2002:2020):** The ILO Conventions signed by China do not set equal requirements to the ILO Declarations on Fundamental Principles and Rights at Work (1998). However, there is labour legislation in place that address e.g., collective bargaining, work safety and forced labour issues China has not made international commitments under ILO. In CFCS COC risk assessment procedures the CFCS shall review compliance with the listed ILO Declaration.

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<sup>2</sup> PEFC ST 2002:2020 Section 4.10

<sup>3</sup> E.g. PEFC ST 2002:2020 Appendix 1 on DDS, chapter 3 on Risk Assessment

The chain of custody standard **complies** with the requirements of PEFC ST 2002:2020, given that the four minor non-conformities are adequately addressed within the given timeframe.

### **3.6 Procedures for logo licensing**

CFCC is the PEFC National Governing Body but PEFC China office is the body that is entitled to issue PEFC logo licenses. It is a legal entity and has defined procedures for logo licensing (cf. CFCC COC standard and CFCC Scheme description (CFCC PRO-01). Holders of PEFC logo licenses shall abide by PEFC ST 2001:2020 on PEFC Trademark Rules.

CFCC did not present additional documentation e.g., on logo license contracting that would have given an in-depth understanding of the logo licensing requirements.

PEFC logo licensing procedures are based on PEFC ST 2001:2020 and conform to PEFC requirements.

**Comment:** CFCS/ PEFC China Office could describe more in detail the steps in the PEFC logo licensing procedure and make available the related contractual documents and forms for different types of logo uses.

### **3.7 Certification and accreditation arrangements**

China National Accreditation Service for Conformity Assessment (CNAS) is the government authorized national accreditation body. It is a member of the International Accreditation Forum. Certification bodies doing CFCS forest management certification shall have a CNAS accreditation whereas in a chain of custody certification CFCS also recognize accreditations from other qualified national accreditation bodies.

#### **Requirements for forest management certification bodies**

CFCC outlines its requirements for accreditation and certification procedures in the CFCS Implementation arrangements (CFCC-PRO-01:2022) and its Annex I. CNAS has developed a joint accreditation scheme for CFCS forest and chain of custody certification (CNAS-S23 (2021). In CFCS accreditations to forest and chain of custody certifications, CNAS applies the national adaptation of the ISO 17065 standard on product certification. This approach is not fully compliant with PEFC Annex 6, which requires the application of ISO 17021 management system standards in the accreditation of forest management certification procedures.

CNAS had concluded that most certification bodies do both forest management and chain of custody certifications and it did not want to require that certification bodies had to establish and implement two parallel management systems (for product and management system certifications). CNAS demonstrated that its accreditation program also includes complementing requirements that would ensure compliance also with the ISO 17021 standard.

Indufor recognized the CNAS justification for applying ISO 17065 standard for certification of products, procedures and services in its accreditation procedures for forest management certification. The conclusion is that CFCS requirements for certification bodies and certification procedures for forest management certification conform to the PEFC requirements.

However, the CNAS and CFCC documentations on accreditation requirements are conflicting which is the reason for the following non-conformity:

- **A minor non-conformity** was raised in accreditation procedures due to the conflict in reference standards in the documentation of CFCC and CNAS requirements in accreditation. The first requires compliance with ISO 17021 standard whereas the accreditation body requires compliance with ISO 17065 standard and its own rules (CNAS-S23:2021). This non-conformity emerges non-conformities in points 2, 9 and 21 in PEFC Checklist 1 on Certification and Accreditation Procedures.

- **Comment:** PEFC requires that auditors comply with the requirements of ISO 19011 standard on *Guidelines for auditing management systems*. CFCC has comprehensive requirements for auditors and audit procedures, but it refers only to selected sections of the ISO 19011 standard (i.e. in sec. 7 on Competence requirements). When limiting the scope of compliance with the standard, CFCC should write out the content of the referred sections to increase the transparency of its requirements. On the other hand, CNAS accreditation rule (CNAS-S23:2021) states that referenced documents (including ISO 19011) become the provisions by reference.

#### **Requirements for the chain of custody certification bodies**

CFCC has adopted the PEFC ST 2003:2020 for the reference standard when it accredits certification bodies certifying to CFCC chain of custody standard (CFCC 2002:2022). CNAS has also integrated the PEFC standard into its operational accreditation requirements.

CFCC accreditation procedures for bodies doing a chain of custody certification conform to PEFC requirements.

#### **Notification of certification bodies**

The CFCC notification procedures for certification bodies doing CFCC forest or chain of custody certification conform to PEFC requirements. The notification terms are well written in Annex I to CFCC- PRO-01:2021 on Procedures for Certification, Accreditation and CFCC Notification of Certification Bodies. Notification is based on a written contract with a certification body.

Apart from the minor non-conformity related to the conflicting requirements in the written accreditation provisions of CFCC and CNAS, the CFCS accreditation arrangements **conform** to the PEFC requirements in forest management and chain of custody certifications.

### **3.8 Detailed assessment of the complaints and dispute resolution procedures**

CFCS complaints procedures cover disputes from the organisation of certification to the operations/decisions of CFCC. The dispute resolution procedures related to standard-setting are defined under the standard-setting rules, but the procedures are very similar to the overall dispute resolution procedures. Complaints on the certification process or decisions of certification bodies will be settled under the procedures of accredited certification bodies.

An independent Dispute Resolution Committee (DRC) discusses and decides on the disputes that are under the given scope. An independent Stakeholder Forum decides on the 5 members of the DRC. The members represent environmental, social and economic interests. CFCC cannot influence the composition or decision making of the DRC. It coordinates the registration of submitted disputes in those cases where it is not involved.

The CFCC dispute resolution procedures **conform** to the PEFC requirements.

## 4. MATERIAL AND METHODS

### 4.1 Material

The conformity assessment was, due to many non-conformities, interrupted. During the interruption, CFCC revised the CFCS documentation. The revised CFCS documentation, i.e., the final set of documents on which this conformity assessment is based, are listed in the table below.

The primary CFCS documents, i.e., the documents that were later updated, included:

- Part One: Scheme Description and Implementation Arrangements, including its annexes (Annex I: Bylaws of the China Forest Certification Council, Annex II: Usage Rules for China Forest Certification Logo, Annex III: Procedures for certification, Accreditation and CFCC Notification of Certification Bodies, Annex IV: Dispute Resolution Procedures, Annex V: Requirements on Forest Certification Auditor, Annex VI: Accreditation Scheme for Forest Certification Bodies (CNAS-SC23:2018), Annex VII: CFCS Terms and Acronyms).
- Part Two: Standard Development Rule.
- Part Four: Forest certification in China --- Forest management.
- Part Five: Forest certification in China --- Chain of Custody, including its annexes (Appendix A: Specification of the CFCC claims, Appendix B: CFCC Logo, Appendix C: Implementation of the chain of custody standard on multisite locations)
- Supplementary requirements for Chain of Custody Certification
- Part Six: Guidelines on Group Forest Management Certification

#### Normative documents

CFCS Document	Date of issuance	Received by assessor
Part One: The Chinese Forest Certification Scheme (CFCS) and Its Implementation Arrangement (CFCC-PRO-01:2021)	13.01.2022	17.01.2022
Annex I Procedures for Certification, Accreditation and CFCC Notification of Certification Bodies	29.10.2021	17.01.2022
Annex II Dispute Resolution Procedures	29.10.2021	17.01.2022
Part Two: Standard Development Rule	20.04.2022	21.04.2022
Part Three: Standard Development Process and Records	13.01.2022	17.01.2022
Part Four: Forest Management Requirements	20.04.2022	21.04.2022
Part Five: Chain of Custody Requirements (CFCC 2002:2022)	20.04.2022	21.04.2022
Part Six: Group Forest Management Requirements	20.04.2022	21.04.2022
Part Seven: Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard <sup>4</sup>	15.01.2022	07.04.2022

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<sup>4</sup> The PEFC requirements for certification bodies was adopted as the CFCS standard.



### Descriptive documents

CFCS Documentation Part	Date of issuance	Received by assessor
Part 3: Standard Development Process and Record for TOF, bamboo and NWTP	NA	04.05.2021
Part 3: Standard Development Process and Record for FM	NA	07.08.2021

Additional documents	Date of issuance	Received by assessor
Part Seven: Important Laws and Regulations	NA	04.05.2021
CNAS-SC23:2021 Accreditation Scheme for Forest Certification Bodies		
CFCC 7 Meeting memo – adoption of PEFC ST 2003:2020 on certification bodies doing COC certification	29.10.2021	07.04.2022
Meeting Minutes-0420.pdf	20.04.2022	21.04.2022
Records of stakeholders feedbacks & CFCC's response on standard revision_CN.pdf		22.04.2022

The PEFC ST 2003:2020 (Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard) was by CFCC adopted as the standard in CFCS.

Following the Indufor draft report submitted on the August 28, 2021, the PEFC Council and the CFCC decided on an interruption of the assessment process for the revision of the CFCS documentation. The revised documents were approved by CFCC on October 19, 2021 (The Standard Development Rule), and on January 13, 2022 (the other documentation). The revised documents were provided to the assessor by CFCC on October 20, 2021 (The Standard Development Rule) and on January 15, 2022 (the other documentation).

Due to the dialogue between CFCC and the assessor, revised versions of Standard Development Rule, Forest Management Requirements, Chain of Custody Requirements, and Group Forest Management Requirements were issued by CFCC on April 20, 2022, to avoid anticipated non-conformities. These documents were received by the assessor on the following day. The final draft report was submitted on April 29, 2022, to the PEFC Council and the PEFC Technical Unit for comments. The comments were received on June 22, 2022. The final report was submitted to the PEFC Council on July 4, 2022.

The conformity of the standard-setting process and performance requirements of the CFCS were assessed against the following PEFC Council requirements:

- Standard-setting requirements: PEFC ST 1001:2017, Standard Setting – Requirements.
- Forest management requirements: PEFC ST 1003:2018, Sustainable Forest Management – Requirements.
- Trees outside Forests requirements: Appendix 2 of PEFC ST 1003:2018, Sustainable Forest Management – Requirements.
- Group certification requirements: PEFC ST 1002:2018, Group Forest Management Certification – Requirements.
- Chain of custody requirements: PEFC ST 2002:2020, Chain of Custody of Forest and Tree Based Products – Requirements.

- Certification & accreditation: PEFC Council Technical Document, Annex 6 (forest management certification), PEFC ST 2003:2012, Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (chain of custody certification).
- Complaints and dispute resolution: PEFC ST 1001:2017, PEFC ST 1002:2018.

## 4.2 Methods

The assessment was done as a desk study based on the documentation listed above. In addition, consultations with stakeholders were carried out in two separate processes. PEFC on its website announced public consultations in March 2021 and Indufor sent questionnaires to 61 stakeholders to inquire about their views on the standard-setting process and on its performance in July 2021. The Indufor China office was carrying out the stakeholder engagement process that was implemented in the Chinese language, including the questionnaire. Altogether 20 answers were received. The questionnaire is in Annex 2 (in English).

The stakeholder consultations were carried out before the interruption of the assessment process. Consequently, the consultations concerned the CFCS documentation before the time-critical revision and therefore not the revised documents approved by the CFCC in October 2021, January 2022 and April 2022.

The following grading of conformity levels was used in the assessment.

### Box 4.1 Assessment Scales Used in Conformity Evaluation

#### **Conformity**

A procedure described by the Scheme documentation fully meets the particular requirement of the PEFC Council

#### **Minor non-conformity**

A minor non-conformity does not violate the integrity of the certification Scheme and is not a bar to endorsement. The assessor recommends appropriate corrective action. Generally, a minor non-conformity should be corrected within 6 months. The assessor may recommend a longer period where justified by particular circumstances.

#### **Major non-conformity**

A major non-conformity violates the integrity of the certification Scheme and has to be corrected before the endorsement of the Scheme.

#### **NA**

Not applicable.

Only a positive conclusion on the conformity was considered to meet the PEFC requirements. The Scheme elements indicating minor or major non-conformities were classified as not meeting the performance level set for the endorsed Schemes.

This report presents a detailed summary of CFCS standard-setting procedure conformity to PEFC requirements and justifies the conclusions made. Annex 1 lists detailed conclusions for each PEFC requirement.



## 5. STRUCTURE OF THE APPLICANT SYSTEM

### China Forest Certification Council

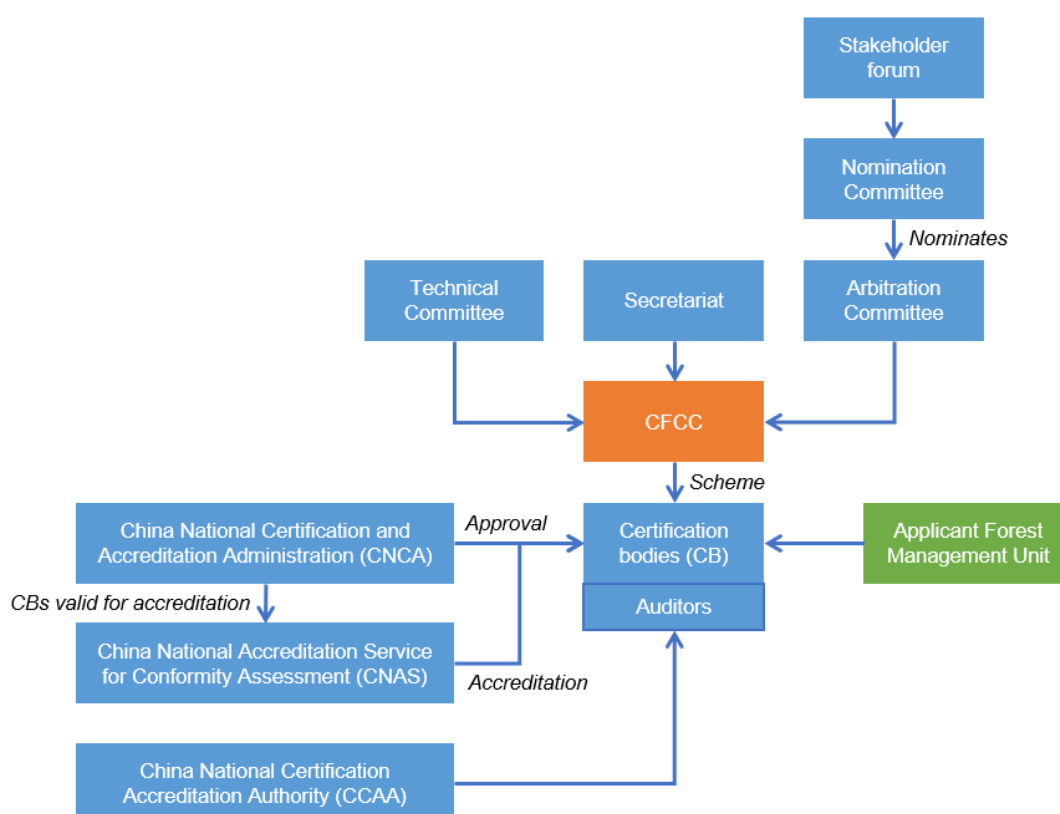
China Forest Certification Scheme (CFCS) is governed by the China Forest Certification Council (CFCC) (Figure 5.1). CFCC Secretariat is responsible for the daily management of the Scheme. The Technical Committee is responsible for the technical support of CFCS. CFCC is a member organisation with 23 members representing social, environmental and economic interests. CFCC bylaws are described in Part I *Scheme Description and Implementation Arrangements, Annex I* of the CFCS documentation.

The CFCC is responsible for

- Developing and managing the CFCS
- Notifying (formally recognizing) the certification bodies
- Conducting arbitration for disputes through the Arbitration Committee
- Issuing the CFCS logo licence.

No significant changes to the CFCS administration have been applied since the first endorsement. A detailed assessment of logo use can be found in chapter 10, and an assessment of the complaint and dispute resolution can be found in chapter 12.

**Figure 5.1 Structure of the China Forest Certification Scheme**



The Arbitration Committee is established to settle disputes related to scheme development or implementation. This Committee is nominated by a Nomination Committee that is in turn elected by a Stakeholder Forum Plenary Meeting (*Part I - Scheme Description and Implementation Arrangements – Annex IV: Dispute Resolution Procedures, Chapter 3*). The Stakeholder Forum

is an open platform consisting of all stakeholders interested in forest certification in China with members not limited to Chinese organizations.

### **Organizations in Accreditation and Certification**

China National Accreditation Service for Conformity Assessment (CNAS) is the government authorized national accreditation body that has the sole right to provide accreditation services in the country. CNAS is a member of the International Accreditation Forum (IAF).

In China, certification bodies entitled to be accredited by CNAS and to carry out certification and verification activities in the country shall be approved by the Certification and Accreditation Administration (CNCA).

China National Certification and Accreditation Authority (CCAA) is the Chinese government agency representing certification and accreditation bodies.

### **Applicants**

Applicants for the CFCS Forest Management Certification (FM) shall be Forest Management Units conducting forest management activities in the territory of China, or any entity applying for the Group Forest Management Certification on behalf of participants.

In China, all land is state-owned and private people, communities or companies may have tenure right to land for 70 years at a time. In principle, the tenure right can be renewed. Tenure rights can be used as a guarantee for a mortgage and thus can be considered a property.

## **6. STANDARD SETTING PROCEDURES AND PROCESS**

### **6.1 Introduction**

The standard-setting procedures of the CFCS are described in the following documents, providing an equivalent to the PEFC ST 1001:2017:

- Standard Development Rule, issued on April 20, 2022 (hereafter “SDR”)

Four versions of the SDR have been assessed in the course of this assignment. The original version, dated 2018, was received by the assessor on May 4, 2021. The subsequent conformity assessment (see Indufor’s first draft report of August 24, 2021) included 21 non-conformities in standard-setting procedures. 23 non-conformities were identified in the standard-setting process. The conclusion was that the CFCS standard-setting procedures and processes do not comply with the PEFC requirements. The CFCC and PEFC International mutually decided to interrupt the assessment process<sup>5</sup> to allow for updating the standard-setting procedures and relevant standards of the CFCS.

The updating was carried out by CFCC as a time-critical revision during the interruption of the assessment process. A new version of the SDR was issued by the CFCC on October 20, 2021. It was assessed only for conformity to the standard-setting procedures as instructed by PEFC International. The findings of this assessment were reported in our draft report on November 12, 2021, which included four minor non-conformities.

A revised SDR version was issued along with the revised standards by the CFCC on January 20, 2022, marking the end of the assessment interruption. The assessor team held a constant dialogue with the CFCC about the preliminary findings of the second standard assessment round, which led to one more SDR version being issued by the CFCC on April 20, 2022. The assessment reported herein considers this latest version of the SDR.

For assessment of the standard-setting process carried out during the interruption, we used the following documentation:

CFCS reference documents:

- Standard Development Process and Records (CFCC- 02/2022), January 13, 2022 (hereafter “SDPR”)

Other documents:

- Meeting Minutes-0420.pdf (April 20, 2022)
- Records of stakeholders' feedback & CFCC's response on standard revision\_CN.pdf

Our reporting herein considers the latest round of the standard-setting process, unless stated otherwise.

The standard-setting procedures and the process were assessed against the requirements of the PEFC ST 1001:2017. The fact that the standard-setting process was carried out as a time-critical revision had major implications on the conformity assessment since major parts of the normal process requirements were not applicable. A summary of the main findings is provided below, following the structure of the PEFC ST 1001:2017. The checklist is included in Annex 1 (Checklist - Standard Setting Procedures and Process, p. 50).

### **6.2 Findings of the Assessment**

#### **Standardizing Body**

The nominal equivalent of the PEFC ST 1001:2017 Chapter 5: *Standardizing body* is the SDR Chapter 5: *Standard Development Organizations*, but their contents differ. The SDR Chapter 5 focuses on the definition of the roles and responsibilities of the CFCC and the Working Group

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<sup>5</sup> In accordance with chapter 6.1.13 (“Interruption of the assessment process”) of the PEFC GD 1007

(WG) and sets requirements concerning the WG composition, management and working principles. The SDR contents equivalent to the PEFC ST 1001:2017 Chapter 5 are scattered across other chapters of the SDR.

- **Minor non-conformity:** Benchmark 5.1.1 a. The SDR omits description of the legal status of the standardising body.

**Comment:** The legal status of the CFCC should be explicitly featured in the SDR. (Benchmark 5.1.1 a)

### **Standard-setting Process**

The main equivalent for the PEFC ST 1001:2017 Chapter 6: *Standard-setting process* is the SDR Chapter 6: *Standard development process*. Some contents relevant to this chapter of the benchmark are also included under SDR Chapter 5. Additionally, the guidelines for reaching consensus are covered separately in SDR Chapter 8. To a large extent, the SDR replicates the PEFC ST 1001:2017 Chapter 6 requirements literally.

The majority of the requirements concerning the process were not applicable due to the time-critical revision.

### **Approval and Publication**

The SDR has no separate chapter titled approval and publication. The SDR contents corresponding with this chapter of the PEFC ST 1001:2017 are included in the SDR Chapter 6: *Standard-setting process*.

- **Minor non-conformity:** Benchmark 7.2.4 (process). The benchmark requires that a development report conforming with the requirements of the PEFC GD 1007 is made publicly available. The PEFC GD 1007 requirements include a summary of major changes and their justification for revised standards. This summary has not been published.

### **Periodic Review of Standards**

The SDR Chapter 11: *Periodic review of standards* is practically identical to the PEFC ST 1001:2017 Chapter 8: *Periodic review of standards*. The process followed the required steps.

**Comment:** It is recommended that the feedback received during the standard implementation is reported explicitly by the standardizing body in the future revision rounds. (Benchmark 8.1)

### **Revision of Standards**

The SDR Chapter 12: *Revision of standards* is practically identical to the PEFC ST 1001:2017 Chapter 9: *Revision of standards*. Mainly requirements related to the time-critical revision were applicable in the conformity assessment of the process.

**Comment:** It is recommended that the appropriate decision-making level (i.e., the body responsible for the process) is defined in the SDR. (Benchmark 9.3.3 c)

## **6.3 Assessment of conformity**

Concerning the standard-setting procedures, the SDR **complies** with the PEFC requirements. **This conclusion is conditional** on addressing the remaining minor non-conformity by including the description of the legal status of the standardising body into the SDR.

Concerning the standard-setting process, the SDR **complies** with the PEFC requirements. **This conclusion is conditional** on publishing the required development report contents.

## **7. FOREST MANAGEMENT STANDARD**

### **7.1 Introduction**

The sustainable forest management requirements of the CFCS are described in part four of the national standard. The original revised version dating to 2019 was titled “Forest certification in China --- Forest management” and received by the assessor on May 4, 2021. The conformity assessment of this document against the PEFC ST 1003:2018 resulted in 35 nonconformities and a conclusion that the CFCS standard on sustainable forest management does not comply with the PEFC requirements. The CFCC and PEFC International mutually decided to interrupt the assessment process to allow for updating relevant standards of the CFCS, including the standard on sustainable forest management.

The updated CFCS standard on sustainable forest management, titled “Forest Management Requirements” (hereafter “FMR”) was submitted for assessment on January 15, 2022. The assessor team held a constant dialogue with the CFCC about the preliminary findings of the second standard assessment round, which led to further revisions in the CFCS sustainable forest management standard and a new version of the FMR being issued by the CFCC on April 20, 2022.

The general structure of the FMR differs from that of the PEFC ST 1003:2018. Some of the individual requirements are nevertheless identical between the two documents.

The assessment reported herein considers the latest version of the FMR, from April 20, 2022. This document was also assessed against the PEFC 1003:2018. A summary of the main findings is provided below, following the structure of the PEFC 1003:2018. The checklist is in Annex 1 (Checklist: Sustainable Forest Management, p. 95).

### **7.2 Findings of the Assessment**

#### **Context of the national standard and the organisations applying a PEFC endorsed standard**

The scope, formulation and specific stipulations included in the FMR meet the requirements of this benchmark chapter.

#### **Leadership**

The sustainable forest management requirements that correspond to this chapter of the PEFC 1002:2018 are under the FMR sections 4.1 *Legal obligations* and 4.4 *Forest management plan*. The relevant contents of the FMR are analogous to the benchmark requirements.

#### **Planning**

The FMR contents corresponding to the *Planning* chapter of the PEFC 1003:2018 are mainly under the FMR sections 4.1 *Legal obligations*, 4.3 *Local community and workers' rights*, and 4.4 *Forest management plan*. The FMR reflects the benchmark requirements generally well.

Regarding PEFC 1003:2018 benchmark 6.3.2.2, China is not a signatory to the ILO 169. China voted in favour of the UN Declaration on the Rights of Indigenous Peoples, but the Chinese government does not recognize the existence of indigenous peoples in China. It does, however, recognize 55 minority nationalities.

Regarding PEFC 1003:2018 benchmark 6.3.3.1, China is a signatory to four out of eight fundamental ILO conventions. The requirements of the four unsigned ILO conventions are covered by specific requirements included in individual FMR standards.

#### **Comments:**

- It is recommended that the requirement to include a description of the current forest management unit in the forest management plan be made explicit in the FMR. It is

also recommended that the language of the FMR is revised so that it explicitly requires the listed contents to be included in forest management plans.

- It is recommended that the requirements to commit to freedom from workplace harassment and to promote gender equality are made explicit in the FMR.

### **Support**

There is no separate section in the FMR dedicated to the aspects covered in the *Support* chapter of the PEFC 1003:2018. The corresponding contents are mainly under the FMR sections 4.3 *Local community and workers' rights* and 4.4 *Forest management plan*.

### **Operation**

The FMR contents corresponding with *Operation*, a large chapter in the PEFC 1003:2018, are included across multiple different sections of the FMR chapter 4. Most of the technical requirements for forest management are included in the FMR section 4.5 *Cultivation and utilization of forest resources*. Despite the different structures, there is generally high compatibility between the two documents, with part of the relevant FMR contents being identical to their respective benchmarks.

- **Minor non-conformity:** Benchmark 8.2.8. There is no reference whether WHO class 1A and 1B pesticides are prohibited by the national laws and regulations, and thus by the standard.

### **Comments:**

- It is recommended that the requirement for successful regeneration is made explicit in the FRM.

### **Performance evaluation**

The FMR includes no specific section for covering performance evaluation. Contents related to monitoring, measurement, analysis and evaluation (benchmark section 9.1) are found across multiple sections of the FMR. Contents identical with benchmark sections 9.2 *Internal audit* and 9.3 *Management review* are included both under FMR section 4.10 *Improvement* and section 4.11 *Organisation*.

**Comment:** It is recommended that the requirement for regular monitoring of working conditions is made explicit in the FMR.

### **Improvement**

The FMR section 4.10 *Improvement* includes standards that are largely identical to the benchmark requirements under this chapter.

## **7.3 Assessment of conformity**

The assessment identified one minor non-conformity between the FMR of April 20, 2022, and the PEFC 1003:2018 benchmark standard. Therefore, the FMR **complies** with the PEFC requirements for sustainable forest management; however, **this conclusion is conditional** on addressing the remaining minor non-conformity.

## **8. GROUP CERTIFICATION MODEL**

### **8.1 Introduction**

The CFCS allows for group certification as a certification model which allows forest owners and managers to become voluntarily certified under one certificate and share the financial obligations arising from forest certification as well as the common responsibility for forest management.

The requirements for the group certificate were in the CFCS defined in its standard “Guidelines on Group Forest Management Certification”. The conformity assessment of this document against PEFC ST 1002:2018 in August 2021 resulted in a total of 60 non-conformities and a conclusion that the CFCS standard on group forest management does not comply with the PEFC requirements. The CFCC and PEFC International mutually decided to interrupt the assessment process to allow for updating relevant standards of the CFCS, including the standard on group certification. The updated CFCS standard on group certification, the “Group Forest Management Requirements” was submitted for assessment on January 17, 2022.

The CFCC document, the Group Forest Management Requirements (hereafter the CFCS GM) is assessed against the PEFC 1002:2018. A summary of the main findings is provided below. The checklist is in Annex 1 (Checklist: Group Forest Management Certification, p. 152).

### **8.2 Findings of the assessment**

The CFCS GM is with regards to structure and contents largely identical to the PEFC 1002:2018. Hence, there are considerable changes in the CFCS GM as compared to the previous version (i.e., the “Guidelines on Group Forest Management Certification”).

#### **Context of the group organisation**

The group organisation is defined in chapter 4 *Context of the group organisation* of the CFCS GM. The chapter outlines requirements for i) determining the general framework for the group organisation, ii) the group management system and iii) understanding the needs and expectations of affected stakeholders.

#### **Leadership**

The CFCS GM chapter 5 “Leadership” defines the functions and responsibilities of the group entity as well as the participants. The chapter also includes requirements on the group entity and the participants to provide commitments to comply with the CFCC Forest Management Standards and the group management system.

#### **Planning**

The CFCS GM recognises the role of planning in a separate chapter (Chapter 6 *Planning*). Here the requirements include having a group management plan where potential changes in the group management system and/or fulfilling requirements on the group level are included.

#### **Support**

Chapter 7 in the CFCS GM includes requirements on support for managing and operating the group certificate. The requirements cover support to manage and keep the group management system up-to-date, communication and awareness processes as well as mechanisms for resolving complaints and disputes.

#### **Operation**

Chapter 8 in the CFCS GM introduces the group organisation and its requirements with regard to the group certificate. The group organisation is responsible for planning, implementing and controlling processes needed to meet the requirements of the CFCS GM and the CFCC Forest Management Standard as well as having a group management plan (described earlier).

Similarly, to the PEFC 1002:2018, there are obligations on establishing and using criteria for the planning, implementing and controlling processes needed to meet the requirements of the CFCS standards.

### **Performance evaluation**

The CFCS GM include requirements for an ongoing internal monitoring programme and an internal audit. The objective of the ongoing internal monitoring programme is to provide confidence in the conformity of the group organisation with the CFCC Forest Management Standard. The CFCS GM require definitions in the monitoring programme with regards to what and when to measure/monitor, methods and analysis.

The CFCS GM require an annual internal audit to provide information on the performance of the group management system. The audit is to cover both the group entity and the participants. Requirements for the organisation of the audit are defined as well as the selection of participants to be audited. Requirements for determination of the sample size are included as well as sample categories and requirements for a management review.

### **Improvement**

Chapter 10 in the CFCS GM, *Improvement*, defines requirements on how to deal with non-conformities, potential re-entry of participants into the group certificate as well as continual improvements.

## **8.3 Assessment of conformity**

The assessment of the Group Forest Management Requirements against the PEFC 1002:2018 found no non-conformities. Therefore, the CFCS GM **comply** with the PEFC requirements (PEFC 1002:2018).



## **9. CHAIN OF CUSTODY STANDARD**

### **9.1 Introduction**

The CFCS requirements for chain of custody are presented in “Part Five: – Chain of Custody requirements” (hereafter referred to as CFCS-COC or CFCC COC 2002:2022). The standard was revised during the assessment and formally approved by CFCC on April 20, 2022. The structure and content of the CFCS-COC follows the PEFC ST 2002:2020 COC standard with the evident intention to have equal requirements in both standards. In the CFCS-COC standard the references to PEFC are replaced with CFCC resulting that the standard refers to CFCS label and CFCC rules. CFCC has also modified PEFC requirements with references e.g., to ILO Declaration on Fundamental Principles and Rights at Work (1998)<sup>6</sup> and replace it with the requirement on compliance with ILO declarations (or conventions) signed by China. Also, direct references to some international organisations not recognized in China (e.g., Transparency International)<sup>7</sup> are stated in generic terms.

The CFCS-COC requirements for chain of custody systems and due diligence procedures are compliant with the PEFC COC standard, but being a scheme specific COC standard, it lacks elements that ensure controlled transfers of certified fibre between certified supply chains under PEFC and CFCS schemes. CFCS does not either have adequate safeguards to prevent non-PEFC endorsed CFCS certified material to enter in to the PEFC endorsed chain of custody systems. CFCS procedures to prevent the flow of material from uncontrolled or controversial sources are in place.

In practice, a scheme specific COC standard shall specify the flow of material and claims between the PEFC and CFCS-COC certified and labelled operators, indicating how material delivered under PEFC controlled sources by a PEFC COC certificate holder will be classified as CFCS certified and treated as controlled sources material under CFCS-COC certificate. Similarly, the flow of material and claims from CFCS COC certified supply chain to PEFC COC certified operator shall be defined.

Currently the CFCS-COC standard does not have comprehensive specifications that would set operational requirements to operators when calculating the certified or controlled origin of input and output materials.

A summary of the main finding is provided below following the structure of the PEFC ST 2002:2020. The checklist including a detailed assessment of the two standards is under Annex 1 (Checklist: Chain of Custody of Forest and Tree Based Products, p. 172).

### **9.2 Findings of the assessment**

#### **Management system requirements**

CFCS-COC management system requirements on documented procedures, the definition of responsibilities and authorities, record keeping, and resource management are almost identical to the PEFC COC standard. CFCS-COC requires regular internal audits and procedures for corrective actions in case of non-conformities. It also includes fully conforming provisions for the outsourcing of chain of custody related activities and appeals procedures.

Regarding health and safety at work, the PEFC benchmark is the ILO Declaration on Fundamental Principles and Right at Work (1998), which urged countries to the abolition of child labour, elimination of discrimination and forced labour and the promotion of freedom of

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<sup>6</sup> PEFC ST 2002:2020 Section 4.10

<sup>7</sup> E.g., PEFC ST 2002:2020 Appendix 1 on DDS, chapter 3 on Risk Assessment

association and right for collective bargaining<sup>8</sup>. The CFCS-COC states that requirements relating to health, safety and labour issues are based on ILO Declarations (should be conventions) which were signed by China. The Comment below explains the status of China in relation to the ILO Declaration.

**Comment (ref. 4.10 PEFC ST 2002:2020):**

The ILO Conventions signed by China do not set equal requirements to the ILO Declarations on Fundamental Principles and Rights at Work (1998). According to Country Baseline Under the ILO Declaration Annual Review (2019) *China has ratified neither the Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) (C.87) nor the Right to Organize and Collective Bargaining Convention, 1949 (No. 98) (C.98)* and it had no intention to proceed with the ratification. However, the same review reports that *The Labour Contract Law of China, which entered into force as of 2008, devotes a special section to explicit provisions on issues such as special collective contracts, industry-wide or region-wide collective contracts, the labour remuneration and the standards for working conditions stipulated in a collective contract and dispute resolution over the collective contracts. Besides, the Company Law and the Law on Prevention and Control of Occupational Diseases also provide for a collective contract*<sup>9</sup>.

**Identification of inputs and declaration of outputs**

The CFCS-COC standard requirements for identification of inputs to the supply chain and declaration of outputs are literally in line with the PEFC COC standard. Being a scheme specific COC standard, it shall adjust in detail the PEFC COC standard requirements for input and output claims and specify the consideration of the different PEFC claims and PEFC COC certified materials in the CFCS COC systems and vice versus.

Trademark use requires compliance with CFCC Label use rules. The CFCS applies PEFC ST 2001:2020 (PEFC Trademarks Rules –Requirements) standard when the applicant uses the PEFC logo<sup>10</sup>.

PEFC COC standard (definition 3.24) defines that material can enter into PEFC certified supply chain only with official PEFC claims. In practice, organisations certified against a PEFC recognised chain of custody standard can sell material to PEFC COC certified companies only using the PEFC official claims (x% PEFC certified). Thus, the CFCS shall describe in detail the conversion of the CFCS claims to PEFC claims under the PEFC endorsement process.

**Chain of custody methods**

The CFCC-COC requirements for physical separation of certified material or percentage-based and credit methods to calculate the share of certified material are identical to PEFC ST 2002:2020 apart from the few replacements of the word PEFC with CFCC.

**Due Diligence System (DDS) requirements**

The CFCC-COC requirements on due diligence are identical to PEFC ST 2002:2020 apart from the few replacements of PEFC with CFCC.

**PEFC DDS for the avoidance of material from controversial sources – Normative Appendix A**

CFCS-COC standard is fully compatible with the PEFC provisions for avoiding material from controversial sources. The general requirements and those for access to information and risk

<sup>8</sup> <https://www.ilo.org/declaration/lang--en/index.htm> (Cited April 19, 2022)

<sup>9</sup> [https://www.ilo.org/declaration/follow-up/annualreview/countrybaselines/WCMS\\_757354/lang--en/index.htm](https://www.ilo.org/declaration/follow-up/annualreview/countrybaselines/WCMS_757354/lang--en/index.htm) (Cited April 19, 2022)

<sup>10</sup> Part One – China Forest Certification Scheme and its Implementation Arrangements

assessment are almost identical to the PEFC requirements. In the standard's Table 1 that defines the indicators for negligible risk, the CFCC has changed the reference to the "corruption index published by Transparency International" into the "latest corruption index published by internationally recognized organization".

CFCS-COC requirements for procedures to address substantiated concerns and management of significant risk supplies, no placement to the market conform to the PEFC requirements.

### **Implementation of the chain of custody standard by multi-site organisations – Normative Appendix B**

CFCS COC standard Appendix B on the chain of custody systems in multisite organisations is identical to the PEFC ST 2002:2020.

## **9.3 Assessment of conformity**

The assessment identified four minor non-conformities in the scheme specific CFCS COC-2002:2022 standard due to gaps in specifications of certified material or claims as required by PEFC in the different steps of chain of custody. The CFCS chain of custody standard does not either take the referred ILO Conventions into account in the same detail as the PEFC ST 2002:2020.

- **Minor non-conformity** PEFC ST 2002; 5.1.2.1: CFCS requires verification of certification status of all certified inputs of CFCC mutually recognised forest certification schemes. CFCC shall specify in the context of PEFC endorsable COC system, what are these certification schemes. CFCS scheme includes certification programs that are not endorsed by PEFC and there is a risk that fiber e.g., from such programs may enter into PEFC COC as PEFC certified. The specification is important to ensure that material entering the CFCC COC is acceptable in terms of PEFC COC requirements and claim.
- **Minor non-conformity** PEFC ST 2002; 5.1.2.2: CFCS does not define how materials and claims entering from CFCS COC system to PEFC COC system are classified and how claims are transferred between the schemes. This is a provision that emerges from the operational implementation of scheme specific COC standards.
- **Minor non-conformity** PEFC ST 2002; 5.2.1: CFCS does not define how the output of materials and claims between the CFCS COC and PEFC COC systems are classified and how claims are transferred between the schemes (cf. previous NC on inputs). CFCS COC standard shall be more specific in defining the flow of certified fiber between PEFC and CFCS COC certified sources. In addition, CFCS shall require that products have PEFC official claims when they are entering into the production of a PEFC COC certified company (cf. cf. PEFC ST 2002 3.24 definition for certified material).
- **Minor non-conformity** PEFC ST 2002; 5.3.1: The CFCS implementation arrangements define that the use of PEFC logo on CFCS certified products shall comply with the PEFC ST 2001:2020. However, this requirement is not clearly stated in the CFCS COC or labelling rules.
- **Summary of the Comment (ref. 4.10 PEFC ST 2002:2020):** The ILO Conventions signed by China do not set equal requirements to the ILO Declarations on Fundamental Principles and Rights at Work (1998). However, there is labour legislation in place that address e.g., collective bargaining, work safety and forced labour issues China has not made international commitments under ILO. In CFCS COC risk assessment procedures the CFCS shall review compliance with the listed ILO Declaration.



The chain of custody requirements **comply** with the PEFC requirements under the condition that corrective actions are taken to address the four minor non-conformities within the given time frame.

## 10. PROCEDURES FOR LOGO LICENSING

This assessment covers the use of the PEFC logo on CFCS certified timber products. CFCC has detailed procedures for the use of the CFCC logo, but the use of the scheme-specific logo is not covered by this assessment. For the use of the PEFC logo, CFCS requires compliance with *PEFC ST 2001:2020 (PEFC Trademarks Rules –Requirements)*<sup>11</sup>. Certification bodies shall control the logo use.

CFCC has not developed procedural documentation that would give rules and guidance for application or contracting procedures for PEFC logo licensing procedures. CFCC is the national governing body but the PEFC logo licensing body is the PEFC China Office. The PEFC logo licensing procedures are not well described in CFCS. This gap is raised as a comment.

- **Comment:** CFCS/ PEFC China Office could describe more in detail the steps in the PEFC logo licensing procedure and make available the related contractual documents and forms for different types of logo uses.

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<sup>11</sup> CFCC-PRO-01:2021, Annex I, 3.3 c

## **11. CERTIFICATION AND ACCREDITATION ARRANGEMENTS**

### **11.1 Documents**

The CFCS requirements for certification bodies doing forest management certification are described in the following documents:

1. CFCC-PRO-01:2022 The Chinese Forest Certification Scheme (CFCS) and its Implementation Arrangement, version 2 of January 13, 2022
2. CFCC-PRO-01:2022 Annex I Procedures for Certification, Accreditation and CFCC Notification of Certification Bodies, October 19, 2021
3. CNAS-SC23:2021 Accreditation Scheme for Forest Certification Bodies, January 18, 2021.

#### **Organizations of accreditation and certification**

China National Accreditation Service for Conformity Assessment (CNAS) is the government authorized national accreditation body that has the sole right to provide accreditation services in the country. CNAS is a member of the International Accreditation Forum (IAF). IAF and also CFCS require that accreditation bodies implement the procedures defined in ISO 17011 standard.

In China, certification bodies entitled to be accredited by CNAS and to carry out certification and verification activities in the country shall be approved by the Certification and Accreditation Administration (CNCA). China National Certification and Accreditation Authority (CCAA) is the Chinese government agency representing certification and accreditation bodies.

CNAS sets the rules for accrediting certification bodies for CFCS forest and chain of custody certifications taking into account the international, national and CFCS specific requirements for certification bodies and procedures.

### **11.2 Forest management certification**

#### **Accreditation requirements**

CNAS requires that accredited certification bodies doing CFCS forest management certification shall comply with

1. ISO 17065 *Conformity assessment — Requirements for Bodies Certifying Products, Processes and Services* and
2. CNAS-SC23:2021 *Forest Certification Body Accreditation Scheme*.

The CNAS document refers to CNAS-CC02 standard which is a national version of the ISO 17065 standard.

PEFCC requires that certification bodies doing forest management certification shall follow the standard ISO 17021 (*Conformity assessment— Requirements for bodies providing audit and certification of management systems*), whereas the CNAS rules refer to the product certification standard. When inquired, CNAS justified this approach by claiming that the ISO 17065 standard and the CNAS-S23:2021 accreditation requirements together require compliance also to the requirements of ISO 17021. CNAS-S23:2021 sets specific competence requirements for staff and audit procedures (in line with ISO 19011 guidelines for *Guidelines for Auditing Management Systems*). The CNAS rules also consider the CFCC procedures for certification and accreditation (CFCC\_PRO-01:2021).

CNAS concluded that most certification bodies carry out both forest management and chain of custody certifications. It preferred to require that certification bodies developed and implemented only one management system covering both certification procedures instead of

two parallel management systems (product and management system certifications). To harmonize the accreditation requirements, CNAS requires that certification bodies' procedures comply with ISO 17065 compatible management system for both forest and chain of custody certifications. The complementing CNAS requirements should ensure together with the ISO 17065 standard, compliance also with the ISO 17021 standard.

Currently, the CNAS and CFCC accreditation requirements are conflicting in writing, because CFCS documentation states that forest management certification shall comply with ISO 17021 standard and CNAS requires compliance with ISO 17065 standard. CFCC and CNAS do not fully compatible accreditation requirements.

### **Certification bodies**

CFCS procedures set general technical competence requirements for certification bodies and auditors which comply with the PEFC benchmarks. The *CNAS-S23:2021 (Accreditation Scheme for Forest Certification Bodies)* requires compliance with the general competence requirements for auditors and audit procedures shall be in line with the standard. CFCC-PRO-01 and its Annex I specify the requirements for certification bodies.

### **Certification procedures**

CFCC-PRO-01 and its Annex I set satisfactory procedural requirements for certification bodies on the definition of internal procedures and information sharing with CFCC. Also, the schedules for surveillance and certification audits are well defined.

CNAS S23:2021 accreditation rules require that audit procedures are in line with ISO 19011 standard.

CFCS document and CNAS accreditation guidelines ask certification bodies to collect information from stakeholders. The CNAS has specified the rules for communication with external parties in line with PEFC requirements.

Certification bodies shall monitor and control CFCC or PEFC logo usage if the certified entity is a CFCC or PEFC logo user. The use of the PEFC logo (and labels) shall comply with the PEFC ST 2001:2020 (PEFC Trademarks Rules –Requirements). Audit reports shall also include information on-label use.

- **Comment:** PEFC requires that auditors comply with the requirements of ISO 19011 standard on *Guidelines for auditing management systems*. CFCC has comprehensive requirements for auditors and audit procedures, but it refers only to selected sections of the ISO 19011 standard. When limiting the scope of compliance with the standard, CFCC should write out the content of the referred sections to increase the transparency of its requirements.

### **Assessment of conformity of accreditation in forest management certification**

The detailed analysis and conclusions on conformity are presented in Checklist 1 on Certification and Accreditation Procedures.

The CFCC PRO-01 (2022) and its Annex I (2021) as well as the CNAS S23:2021 provisions for accreditation are revised in line with the PEFC requirements. The CFCS requirements for certification bodies and certification procedures comply with the PEFC requirements.

Indufor recognized the CNAS justification for applying the ISO 17065 standard for certification of products, procedures and services in its accreditation procedures and did not insist on exclusive reference to the ISO 17021 standard for certification of management systems, which is literally a PEFC requirement. Indufor approved the claim that CNAS's own rules complement the requirements and ensure compliance also with ISO 17021.



- **A minor non-conformity** was raised in accreditation procedures due to the conflict in the CFCC and CNAS requirements in accreditation. The first requires compliance with ISO 17021 standard whereas the accreditation body requires compliance with ISO 17065 and its own rules (CNAS-S23:2021). This non-conformity emerges non-conformities in points 2, 9 and 21 in PEFC Checklist 1 on Certification and Accreditation Procedures.

### **11.3 PEFC requirements for chain of custody certification bodies**

PEFC Council introduced specific requirements for certification bodies doing a chain of custody certification (PEFC ST 2003:2020). The scope of the PEFC standard focuses on the *requirements for certification bodies operating chain of custody certification against PEFC ST 2002 standard* (i.e., international PEFC chain of custody standard). The PEFC checklist of the PEFC ST 2003:2020 states that it *shall be completed by any system that applies for endorsement and recognition of a system-specific Chain of Custody standard (i.e., a national Chain of Custody standard) unless the system has adopted the PEFC ST 2003:2020*.

CFCS has a scheme-specific chain of custody standard that is a national adaptation of the international PEFC ST 2002:2020.

CFCC has adopted in its meeting on October 29, 2021, the PEFC ST 2003:2020 requirements for certification bodies doing a chain of custody certification under the CFCS scheme. According to the minutes, 18 participating committee members voted unanimously for the adoption of the standard. The PEFC standard was already incorporated by CNAS into its Accreditation Scheme for Forest Certification Bodies (CNAS SC23:2021)

#### **Assessment of conformity of accreditation in the chain of custody certification**

The accreditation requirements for CFCS chain of custody certification bodies **conform** to the PEFC requirements. The CFCC and CNAS have adopted the PEFC ST 2003:2020 as the reference standard in the accreditation.

### **11.4 PEFC requirements for notification of certification bodies**

CFCC requires that certification bodies doing forest and/or chain of custody certification shall sign a notification contract with CFCC. CFCC notification procedures are described in CFCC-PRO-01:2022, Annex I. The rules require that a notified certification body is a legal entity and agree to be listed on the publicly available CFCC website. Certification bodies shall have valid accreditation and carry out forest management/chain of custody certification in accordance with CFCS standards and other relevant documentation within the scope of the accreditation.

*The certification body carrying out CFCS forest management certification shall be accredited by CNAS, and the certification body carrying out the chain of custody certification shall be accredited by CNAS or other accreditation bodies which shall be a member of the International Accreditation Forum (IAF) or a member of IAF's special recognition regional groups and implement procedures described in ISO/IEC 17011 and other documents recognized by the above organizations.*

The well-defined notification rules and contract templates are based on non-discriminatory notification procedures. There is a possibility to make an appeal to CFCC in case of conflicts in the notification process.

#### **Assessment of conformity of notification of certification bodies**

The CFCC notification procedures **conform** to PEFC requirements.



## 12. DETAILED ASSESSMENT OF THE COMPLAINTS AND DISPUTE RESOLUTION PROCEDURES

PEFC requires appropriate procedures for addressing complaints and disputes in several processes in scheme implementation:

- PEFC ST 1001:2017 on standard-setting requires impartial resolution procedures if stakeholders in standard-setting cannot resolve a substantial (sec. 6.4.8)
- PEFC ST 1002:2018 on group certification requires that appropriate mechanisms shall be in place for resolving complaints and disputes relating to group management and sustainable forest management operations.
- In addition, accreditation requires that certification bodies have documented procedures to address complaints related to the certification process and decisions. Accreditation bodies shall also have dispute procedures for any complaints arising between accreditation and certification bodies.

CFCC Dispute Resolution Procedures are described in Part 1, Scheme Description and Implementation Arrangements Ch 10 and in Annex II on Dispute Resolution Procedures (October 19, 2021). CFCC dispute resolution procedures apply to all complaints related to CFCC and its actions and decisions and other disputes. *Disputes relating to the decisions and activities of a certified entity, an accredited CB or shall be dealt with by the dispute resolution procedures of the relevant accredited CB, AB, or by the International Accreditation Forum (IAF), respectively* (CFCC Part 1 ch 10.). Procedures to address disputes related to standard-setting are described in Part 2 Standard Development Rule (October 19, 2021 ch 13) and the structures will be developed during the development process.

The structures of dispute resolution are slightly different for disputes that involve CFCC or concert only with other parties. The basic principle in both types of disputes is that an independent Dispute Resolution Committee (DRC) representing economic, social and environmental interests will study and find a solution to the dispute.

CFCC dispute resolution process is as follows:

- The Stakeholder Forum members representing economic, social and environmental interests propose members to the Nomination Committee (3 members) who then proposes members to the DRC (5 members). The Stakeholder Forum makes the final decision on the memberships in both Committees. The members shall be impartial and have no interest in any party of the dispute. CFCC is not directly involved in the nomination of the members. CFCC shall not influence the nomination of DRC.
- There are different procedures for registration and acknowledgement of the complaint to the complainant if CFCC is a party in the complaint or not. Disputes, where CFCC is a party, shall be submitted in writing to the chair of DRC, with a copy to the CFCC chairman. DRC will notify the complainant. Other complaints, not involving CFCC, shall be addressed in writing to the CFCC secretary, with a copy to the CFCC chairman. CFCC will inform DRC of the complaint and notify the complainant. DRC chair approves the dispute for the resolution process.
- CFCC Secretariat coordinates the information collection from all parties mentioned in the complaint and promptly forwards the material to the DRC. The requested parties have a 20-day timeframe to provide additional information and there the DRC shall decide within 15 days. The majority decision shall be made based on the material received. In exceptional situations, the DRC can ask for external expertise, do field visits, or ask for additional information.
- Appeals procedures are in place. Any party can appeal to the Stakeholder Forum through CFCC Secretariat if it is unsatisfied with the resolution. A plenary meeting of the Stakeholder Forum decides if the appeal is accepted. CFCC may not influence the discussion of the Stakeholder Forum.

**The CFCC Dispute Resolution Procedures (Annex II Part 1) comply with the PEFC requirements.** The written procedures describe the responsibilities of CFCC, Dispute



Resolution Committee and Stakeholder Forum as well as the procedures for acknowledgement of complaints, collection of evidence, communication, decision making and appeals procedures.

### 13. STAKEHOLDER VIEWS

#### 13.1 International Consultation

An international stakeholder consultation was launched on March 4, 2021, on the website of PEFC International<sup>12</sup>. No comments from stakeholders were received through this process by the deadline on April 30, 2021.

#### 13.2 National Consultation on Standard-Setting

The stakeholder consultations were carried out prior to the interruption of the assessment process. Consequently, the consultations concerned the CFCS documentation prior to the time-critical revision and therefore not the revised documents approved by the CFCC in October 2021, January 2022 and April 2022.

Indufor sent questionnaires to 61 stakeholders to inquire about their views on the standard-setting process and on its performance in July 2021. The Indufor China office was carrying out the stakeholder engagement process, which was implemented in the Chinese language, including the questionnaire. An English version of the questionnaire is included in Annex 2.

Altogether 20 answers were received. Their distribution by stakeholder category is shown in Table 1.

**Table 1 Number of Responses Received by Stakeholder Category**

#	Stakeholder category	No. of responses
1	3rd Party Certification Agent	4
2	Education – Research Institute	5
3	Education – University	2
4	Government Authority	3
5	NGO – Social	1
6	NGO – Environmental	1
7	Private Sector – Company	3
8	Private Sector – Forest Farm	1
Total		20

17 out of 20 stakeholders that provided their answers reported participating in the standard development process. The remaining three reported that they would have been interested to participate. The participating stakeholders reported that they had received an invitation to participate in the process from the CFCC.

The following aspects came out in the responses concerning the stakeholders' main interest to participate in the standard development process:

- Interest in sustainable forest management – would like to give inputs on standard revision based on their own understanding.
- General attention to forest certification.
- Concerns about the certification of TOF.
- Understanding of the importance of the topic – would like to know the FMR revising details and the impacts on other standards.
- Interest in the impact of the standard revision on certification agents – would be helpful for certification agents to take action in advance.

<sup>12</sup> <https://pefc.org/news/public-consultation-chinese-forest-certification-system>

- Interest in the impact of the standard revision on their own industries (i.e.: pulp & paper)

Out of the 17 participating stakeholders, 16 stated that in their opinion all parties relevant to standard development had been proactively identified, invited and given the possibility to participate in the standard development. One replied I don't know. Also, 16 participating stakeholders stated that the working groups had represent different interests in a balanced way. One replied I don't know.

All 17 were of the opinion that the organiser had provided adequate material before the process, that the revision process had followed the procedures that were communicated with participants in advance, that they were aware of any substantive or procedural complaints by any stakeholder on standard development, and that they were aware of dispute settlement procedures in case of conflicting views.

16 stakeholders who participated in the process stated that in their view there was still a need for further consideration of some aspects related to the process, while one stakeholder stated that there was not. The aspects suggested by the 16 stakeholders for further consideration included the following:

- *CFCS should be more adapted to the local practice of Chinese forestry, including TOF*
- *Should lower the TOF's certification requirements.*
- *Should lower the environmental protection requirements for small-scale forest land.*
- *Requirements for forest monitoring should be more targeted.*
- *Considering China's carbon neutrality goal, it is recommended to include forestry carbon sink into relevant standards.*

Only 16 stakeholders responded to the following questions. All 16 responded positively to each question presented:

- Have you been given a meaningful opportunity to contribute to the standard formulation and to submit comments for further consideration?
- Were the views and comments submitted by any participant in the Standard Setting Working Groups considered in an open and transparent way?
- Have all comments received in public consultations been discussed and addressed in an objective and transparent way?
- Were the criteria (requirements) in the standard agreed on in consensus?

Other comments provided by stakeholders through the questionnaire included the following:

- *Each country has its own specific forest management systems, mechanisms, policies, and models. Therefore, the standard applicability is crucial.*
- *The benefits of forest certification to private sectors are not significant, which needs to increase the market publicity as well as the procurement requirements for certified products.*
- *What's the next step after getting PEFC endorsement? Does CFCC have a plan to hold conferences/seminars to explain the details to the public/interested parties?*

## Annex 1

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### **PEFC Standard and System Requirements Checklist**



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## PEFC Checklist (1) - Certification and Accreditation Procedures

### 1 Scope

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*.

#### Referred CFCS Documents:

CFCC-PRO-01:2021, Annex I	Procedures for Certification, Accreditation and CFCC Notification of Certification Bodies, October 19, 2021
CFCC-PRO-01:2022	The Chinese Forest Certification Scheme (CFCS) and Its Implementation Arrangement version 2 of January 13, 2022
CNAS-SC23:2021	I) Accreditation Scheme for Forest Certification Bodies
CFCC No 7 2021	II) CFCC meeting memo on adoption of PEFC ST 2003:2020 for reference standard setting requirements for CBs doing chain of custody certification.
CNAS publication 28.1.2021	Notification on the Publication of CNAS-SC23:2021. List of changes compared to the CNAS 23:2018
CNAS reply to questions 23.3.2022	Justification why CNAS applies ISO 17065 (CNAS CC02) standard for forest management certification instead of ISO 17021 required by PEFCC

### 2 Checklist

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
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	Y	<b>Part One: The Chinese Forest Certification Scheme (CFCS) and Its Implementation Arrangement</b> 3.3.1 FM and COC certification under the CFCS shall be carried out by impartial, competent and independent third parties (CBs) that cannot be involved in consultancy, or in the standard setting process as governing or decision-making bodies, or in forest management, and are independent of the certified entity or entity to be certified [i.e. Forest Management Unit (FMU), or timber company].



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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><b>Annex I: Procedures for Certification, Accreditation and CFCC Notification of Certification Bodies (CFCC-PRO-01:2022)</b></p> <p><b>2.1.1 Jurisdiction of certification bodies</b></p> <p><i>CFCS certifications shall be carried out by impartial, independent third parties that cannot be involved in the standard setting process as governing or decision making bodies.</i></p> <p><b>2.1.3 Competences of certification bodies</b></p> <p><i>(d) The certification body shall not have any link with the certified entity or forest management.</i></p> <p>CNAS 23:2021</p> <p><i>1.2 Forest certification bodies shall meet the requirements of CNAS-CC02 Requirements for Bodies Certifying Products, Processes and Services of this document, and shall also meet other accreditation rules formulated by CNAS and accreditation criteria and guidelines applicable to product certification bodies.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>CFCS documentation explicitly require independence of CBs and CNAS accreditation requirements refer to international requirements for certification bodies certifying products and services. The CNAS-CC02 is a national version of the ISO 17065 standard that also requires impartiality and independence of CBs</p>
Does the scheme documentation require that certification body for forest management certification shall fulfil requirements defined in ISO 17021?	Annex 6, 3.1	N	<p>CFCC-PRO-01:2022</p> <p><b>3.3.3.... An accredited CB for forest management ... certification shall fulfil the following requirements:</b></p> <p><i>(i) The CB for forest management certification shall fulfil requirements defined in: a) ISO/IEC 17021-1 (Conformity assessment - Requirements for</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>bodies providing audit and certification of management systems); and b) other requirements for CBs defined by CNAS</p> <p><b>7.2 The CB carrying out forest management certification shall be accredited</b> based on ISO/IEC 17021-1 and CNAS-SC 23 (Accreditation Requirements for Forest Certification Body) and shall be covered by the accreditation scope, which specifies the standard(s) used in the CFCS</p> <p>CFCC-PRO-01:2022, Annex I</p> <p><b>2.1.2 Qualifications of certification bodies</b></p> <p>(a) Certification bodies carrying out CFCS Forest Management certification shall fulfil the ISO/IEC 17021-1.</p> <p>CNAS 23:2021</p> <p>1.2 Forest certification bodies shall meet the requirements of CNAS-CC02 Requirements for Bodies Certifying Products, Processes and Services.</p> <p>CNAS reply to questions 23.3.2022</p> <p>CNAS requires forest certification bodies to meet both of the following requirements: a) ISO/IEC17065 <i>Conformity assessment — Requirements for Bodies Certifying Products, Processes and Services</i> and CNAS-SC23 <i>Forest Certification Body Accreditation Scheme</i></p> <p>CNAS-SC23 comprises those requirements to the forest certification bodies engaged in FM which are specified by CNAS in accordance with ISO/IEC17021-1, the PEFC requirements to forest certification bodies (including requirements on forest certification personnel), and ISO19011 <i>Guidelines for Auditing Management Systems</i>.</p> <p><b>Conclusion: Minor non-conformity</b></p> <p><b>Justification:</b></p> <p>The CFCS and CNAS documentations on accreditation requirements are conflicting, because the accreditation body CNAS considers that forest certification shall comply with the procedures of product and service</p>





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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			certification (ISO 17065/ CNAS-CC02) and CFCC refers only the standard ISO 17021 management system certification.  However, in practice CNAS claims that its accreditation requirements for forest management certification also cover all the elements listed in ISO 17021 standard.
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	Y	CFCC-PRO -01:2022 3.3.3 (see above)  <i>(iii) The CB carrying out forest management certification shall have the technical competence in forest management, on its economic, social and environmental impacts, and a good understanding of the standard for forest management certification used in the CFCS.</i>  CFCC-PRO-01:2022, Annex I  <b>2.1.3 Competences of certification bodies</b>  <i>(a) The certification body carrying out forest management certification shall have the adequate technical know-how and competence in forest management, on its economic, social and environmental impacts, and on the forest certification criteria.</i>  <i>(c) The certification body shall have a good understanding of the requirements of CFCS, especially the requirements of the Chinese forest certification standards</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> CFCC sets satisfactory requirements for the technical competence of certification bodies.
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	Y	CFCC-PRO-01:2022, Annex I  <b>2.1.3 Competences of certification bodies</b>  <i>(c) The certification body shall have a good understanding of the requirements of CFCS, especially the requirements of the Chinese forest certification standards.</i>  <b>Conclusion: Conformity</b>



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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Justification:</b> Certification bodies shall know thoroughly the national certification scheme CFCS.
Does the scheme documentation require that certification bodies have the responsibility to use competent auditors and who have adequate technical know-how on the certification process and issues related to forest management certification?	Annex 6, 3.2	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>2.2 Auditors</b></p> <p><i>Certification bodies have the responsibility to use competent auditors.</i></p> <p><i>The auditors shall have adequate technical know-how on the certification process and issues related to forest management or chain of custody certification respectively.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The CFCS general requirement on competence of certification bodies is satisfactory.</p>
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	Y	<p>CFCC-PRO-01:2022</p> <p><b>3.4 Auditors</b></p> <p><i>3.4.1 The CB has the responsibility to appoint competent auditors with suitable academic qualification and adequate technical know-how on the certification process and issues related to forest management or chain of custody certification, respectively.</i></p> <p><i>3.4.2 For forest management certification, the auditors shall fulfil the requirements as defined in Part 2 of ISO/IEC 17021</i></p> <p><i>3.4.4 The auditors under the CBs in China shall also have to fulfil the additional requirements for auditors carrying out forest management or chain of custody audits as defined by CCAA (China National Certification Accreditation Authority). The compliance of the auditors with the above requirements shall be verified during the accreditation carried out by CCAA</i></p> <p>CFCC-PRO-01:2022, Annex I,</p> <p><b>2.2.1 Auditors general requirements</b></p>



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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><i>The auditors shall fulfil general criteria as defined in 7.1, 7.2, 7.3.1, 7.3.2 of ISO 19011 (Guidelines for quality and /or environmental management systems auditing).</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CFCS requires that auditors fulfil the general competence and procedural requirements as defined in ISO 19011 and ISO 17021 standards. The referred sections in ISO 19011 set requirements to competence of auditors and team leaders as well as to personal behaviour in audit process. CNAS-S23:2021 makes reference to ISO 19011 and states that it becomes the provision of the CNAS accreditation program for forest certification.</p> <p><b>Comment:</b> CFCC should write out the content of the referred ISO 19011 requirements.</p> <p><b>Comment:</b> CFCC refer to competence requirements of the ISO standard 17021 although CNAS carries out the accreditation in line with ISO 17065 compatible national standard. CNAS ensures that ISO 17065 and CNAS-S23:2021 together set requirements that are in line with ISO 17021.</p>
Does the scheme documentation include additional qualification requirements for auditors carrying out forest management audits? <sup>[1]</sup>	Annex 6, 3.2	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>2.2.2 Auditors proficiency requirements</b></p> <p>(1) In normal conditions, the auditors for carrying out forest management certification shall satisfy the following minimum proficiency requirements:</p> <p>(a) <i>The auditors shall hold a State-recognized junior college or above degree in forestry or forestry-related discipline.</i></p> <p>(b) <i>The certification body shall make sure that the auditors have a minimum five-year full-time working experience in forest management-related jobs.</i></p> <p>(c) <i>The auditors shall have received and completed official assessor trainings organized by or for the certification body.</i></p> <p><b>2.2 Auditors</b></p>



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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><i>Certification bodies shall organize the CFCC-recognized trainings for their auditors at least every two years to ensure the auditors have the adequate knowledge and competence for the purpose of conducting relevant certifications.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CFCS sets additional requirements for education and training and work experience</p>
Does the scheme documentation require that certification bodies shall have established internal procedures for forest management certification?	Annex 6, 4	Y	<p>CFCC-PRO:2022</p> <p><i>6.3 The CB shall have established internal procedures for auditing and certification against the standards used in the CFCS. It should also make 9 publicly accessible, or provide upon request, information describing the auditing and certification processes for granting, maintaining, extending, renewing, reducing, suspending or withdrawing certification</i></p> <p>CFCC-PRO-01:2022, Annex I</p> <p><i>3.1. The certification body shall have established internal procedures for forest management certification and chain of custody certification in accordance with the China Forest Certification Scheme (CFCS).</i></p> <p>CNAS 23:2021 Accreditation requirements</p> <p><b>C1 Basic requirements</b></p> <p><i>C1.1 Forest certification bodies shall conduct audit and certification activities in accordance with the requirements of Forest Certification Rules jointly issued by CNCA and the former State Forestry Administration</i></p> <p><b>C3 Quality system</b></p> <p><i>Forest certification bodies shall establish and implement a documented management system in accordance with the requirements of CNAS-CC02 and this document. The quality manual and related procedures shall include the following certification procedures:</i></p>



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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>A) Application acceptance;  B) Pre-qualification requirements (except chain of Custody certification);  C) Soliciting opinions from stakeholders (except for chain of Custody certification);  D) Request of the chief adjudicator;  E) Review of audit reports;  F) Peer expert review (except chain of Custody certification);  G) Certification decision;  H) Issuing certification certificates;  I) Monitoring and recertification;  J) Restoration of certification suspension.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CNAS requirements for certification bodies specify the scope and content of the internal management system/procedures.</p>
Does the scheme documentation require that applied certification procedures for forest management certification shall fulfil or be compatible with the requirements defined in ISO 17021?	Annex 6, 4	N	<p>CFCC-PRO-01:2022</p> <p><b>3.3.3.... An accredited CB for forest management ... certification shall fulfil the following requirements:</b></p> <p>(i) The CB for forest management certification shall fulfil requirements defined in: a) ISO/IEC 17021-1 (Conformity assessment - Requirements for bodies providing audit and certification of management systems); and b) other requirements for CBs defined by CNAS</p> <p><b>7.2 The CB carrying out forest management certification shall be accredited based on ISO/IEC 17021-1 and CNAS-SC 23 (Accreditation Requirements for Forest Certification Body) and shall be covered by the accreditation scope, which specifies the standard(s) used in the CFCS</b></p> <p>CFCC-PRO-01:2022, Annex I</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>3.2 The applied certification procedures for forest management certification or chain of custody certification shall respectively fulfil or be compatible with the requirements of ISO 17021-1 and ISO 17065.</i></p> <p>CNAS S23 (2021)</p> <p>1.2 Forest certification bodies shall meet the requirements of CNAS-CC02 Requirements for Bodies Certifying Products, Processes and Services of this document, and shall also meet other accreditation rules formulated by CNAS and accreditation criteria and guidelines applicable to product certification bodies.</p> <p>CNAS reply to questions 23.3.2022</p> <p>CNAS requires forest certification bodies to meet both of the following requirements: a) ISO/IEC17065 <i>Conformity assessment — Requirements for Bodies Certifying Products, Processes and Services</i> and CNAS-SC23 <i>Forest Certification Body Accreditation Scheme</i></p> <p>CNAS-SC23 comprises those requirements to the forest certification bodies engaged in FM which are specified by CNAS in accordance with ISO/IEC17021-1, the PEFC requirements to forest certification bodies (including requirements on forest certification personnel), and ISO19011 <i>Guidelines for Auditing Management Systems</i>.</p> <p><b>Conclusion: Minor non-conformity</b></p> <p><b>Justification:</b></p> <p>The CFCS and CNAS documentations on accreditation requirements are conflicting, because the accreditation body CNAS considers that forest certification shall comply with the procedures of product and service certification (ISO 17065/ CNAS-CC02) and not those of management system certification.</p> <p>However, in practice CNAS claims that its accreditation requirements for forest management certification also cover all the elements listed in ISO 17021 standard.</p>



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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
Does the scheme documentation require that applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011?	Annex 6, 4	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p>3.2 <i>The applied auditing procedures shall fulfil or be compatible with the requirements of ISO 19011.</i></p> <p>CNAS 23 (2021)</p> <p><b>2 Normative reference documents</b></p> <p><i>GB/T/19011 Guidelines for quality and/or environmental management system audits</i></p> <p><i>C8.4 The forest certification authority shall identify training needs and provide specific training to personnel A) Ensure that its auditors have completed the audit skills training based on GB/T19011</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CNAS accreditation procedures require competence and implementation of ISO 19011 guidelines in auditing.</p>
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	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>3.3 In addition to above requirements the certification body shall:</b></p> <p><i>(a) reporting of the certification information:</i></p> <p><i>Informs CFCC about the information of the all issued forest management or chain of custody certificates and changes concerning validity and scope of these certificates.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> Certification bodies shall keep CFCC informed on all issued certificates</p>
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	Y	<p>CFCC-PRO-01:2021, Annex I</p> <p><b>3.3 In addition to above requirements the certification body shall:</b></p> <p><i>(b) Surveillance of certification logo: carries out monitoring and control of CFCC or PEFC logo usage if the certified entity is a CFCC or PEFC logo user.</i></p>



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PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><i>(c) The use of PEFC logo (and labels) shall comply with the PEFC ST 2001:2020 (PEFC Trademarks Rules –Requirements).</i></p> <p>CNAS 23 (2021)</p> <p><i>C9.4 Audit report</i></p> <p><i>Audit reports for other certification groups should include at least:</i></p> <p><i>D) Certified product sales and label use;</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> In the CNAS accreditation rules forest management certification is under the “other certification groups”. The scope of audit covers the use of label. The rules do not specifically refer to CFCS or PEFC labels.</p>
Does a maximum period for surveillance audits defined by the scheme documentation not exceed more than one year?	Annex 6, 4	Y	<p>CFCC-PRO-01:2022, Annex I,</p> <p><b>3.4 Validity of certification and annual audits</b></p> <p><i>The surveillance audit (annual audit) is conducted every year.</i></p> <p>CNAS 23 (2021)</p> <p><b>C11.1 Surveillance and surveillance frequency</b></p> <p><i>In general, forest certification bodies should conduct on-site surveillance and audit at least once a year, and reserve the right to carry out surveillance and audit without prior notice.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The maximum period for surveillance audits do not exceed one year as required by PEFCC.</p>
Does a maximum period for assessment audit not exceed five years for forest management certifications?	Annex 6, 4	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>3.4 Validity of certification and annual audits</b></p> <p><i>Validity of each certificate for forest management certification or chain of custody certification lasts five years.</i></p>





**Indufor**

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>CNAS</p> <p><i>C10.2 Certification certificate shall not be valid for more than 5 years. In special circumstances (such as force majeure, etc.), recognize The validity of the certificate can be extended for up to six months.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The assessment audits shall be carried out every fifth year before the validity of a certificate expires.</p>
Does the scheme documentation include requirements for public availability of certification report summaries?	Annex 6, 4	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>3.6</b> <i>The full text and the summary of the certification report, including the findings on the auditee's conformity with the forest management certification standard, written by the certification body, shall be submitted to CFCC. CFCC shall make the summary of the certification report available to the public.</i></p> <p>CNAS</p> <p><i>C6.1 The forest certification Body shall maintain true, complete and up-to-date records relating to:</i></p> <p><i>III) Public summary of audit report</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CCFC receives certification reports and their summaries. It is obliged to make the summaries available to the public as required by PEFC.</p>
Does the scheme documentation include requirements for usage of information from external parties as the audit evidence?	Annex 6, 4	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>3.5</b> <i>The audit evidence to determine the conformity with the forest management standard shall include relevant information from external parties (e.g. government agencies, community groups, conservations organizations, etc.) as appropriate.</i></p> <p>CNAS</p>



**Indufor**

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>9.3.1 <i>Pre-examination (shall include the following contents):</i>  G) <i>Preliminary identification of all stakeholders and preparation of a list;</i>  H) <i>Preliminary hearing report.</i></p> <p>C9.3.2 <i>Soliciting opinions from stakeholders (except for chain of Custody certification)</i></p> <p><i>The forest certification authority shall seek advice from a range of stakeholders to obtain information on the organization's compliance with the environmental, regulatory, social and economic requirements of the certification criteria (see Appendix B for specific requirements).</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CFCS requires that certification bodies collect information also from external parties.</p>
Does the scheme documentation include additional requirements for certification procedures? <sup>[1]</sup>	Annex 6, 4	Y	<p>CFCC-PRO-01:2022, Annex 1</p> <p>3. <i>Compliance of the certification body's procedures with the above requirements (3.1. – 3.6) shall be verified by accreditation.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CFCS sets some additional requirements for certification bodies. The reference to requirements 3.1 – 3.6 of Annex I is added by the assessor. The requirements are listed under PEFC questions 8.-17.</p>
Does the scheme documentation require that certification bodies carrying out forest management certification shall be accredited by a national accreditation body?	Annex 6, 5	Y	<p>CFCC-PRO-01:2022</p> <p><b>7. Accreditation Procedures</b></p> <p>7.1 <i>The CB in China carrying out certification shall be accredited by CNAS, which is a member of the International Accreditation Forum (IAF). The accredited certificate shall bear the accreditation symbol of CNAS. Information on accreditation including the accreditation number and name of the AB shall accompany any certificate issued by the accredited CB under the CFCS.</i></p>



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>CFCC-PRO-01:2022., Annex 1,</p> <p><b>4. Accreditation</b></p> <p><i>By law any certification body or organization which intends to conduct the certification in the territory of China shall apply and be approved by Certification and Accreditation Administration of the People's Republic of China (CNCA), then registered legally.</i></p> <p><i>CFCC stipulates that certification bodies carrying out CFCS forest management and chain of custody certification shall be respectively accredited by a national accreditation body in accordance with the rules defined in ISO 17021 or ISO17065.</i></p> <p><i>CFCC requires that the certification body carrying out CFCS forest management certification shall be accredited by CNAS</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CBs doing forest management shall have accreditation by CNAS and for COC certification accreditation shall be issued by CNAS or other national accreditation body.</p>



**Indufor**

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
Does the scheme documentation require that an accredited certificate shall bear an accreditation symbol of the relevant accreditation body?	Annex 6, 5	Y	<p>CFCC-PRO-01:2022</p> <p><b>7. Accreditation Procedures</b></p> <p><i>7.1 ...The accredited certificate shall bear the accreditation symbol of CNAS. Information on accreditation including the accreditation number and name of the AB shall accompany any certificate issued by the accredited CB under the CFCS</i></p> <p>CFCC-PRO-01:2022, Annex I</p> <p><b>4</b> <i>The certification body shall undertake forest management and/or chain of custody certification as “accredited certifications”, the forest management or chain of custody standard(s) / scheme should be covered by the accreditation scope. An accredited certificate shall bear an accreditation symbol of the relevant accreditation body.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The CFCS requires that certificates indicate the accreditation status of the certification body and that the certification process is carried out under the accreditation.</p>
Does the scheme documentation require that the accreditation shall be issued by an accreditation body which is a part of the International Accreditation Forum (IAF) umbrella or a member of IAF's special recognition regional groups and which implement procedures described in ISO 17011 and other documents recognised by the above mentioned organisations?	Annex 6, 5	Y	<p>CFCC-PRO-01:2022</p> <p><i>7.1 The CB in China carrying out certification shall be accredited by CNAS, which is a member of the International Accreditation Forum (IAF).</i></p> <p>CFCC-PRO-01:2022, Annex I</p> <p><i>4. The accreditation bodies shall be a member of the International Accreditation Forum (IAF) or a member of IAF's special recognition regional groups and implement procedures described in ISO/IEC 17011 (Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies) and other documents recognized by the above organizations. The sole national accreditation body of China is China National Accreditation Service for Conformity Assessment (CNAS, a member of IAF).</i></p>



**Indufor**

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><i>CFCC requires that the certification body carrying out CFCS forest management certification shall be accredited by CNAS,</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CFCC requires that recognized accreditation body is a member of IAF.</p> <p><b>Comment:</b> CNAS is a recognized member of IAF (<a href="https://iaf.nu/en/recognised-abs/">https://iaf.nu/en/recognised-abs/</a> (21.03.22))</p>
Does the scheme documentation require that certification body undertake forest management certification as “accredited certification” based on ISO 17021 and the relevant forest management standard(s) shall be covered by the accreditation scope?	Annex 6, 5	N	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>4 CFCC stipulates that certification bodies carrying out CFCS forest management ... certification shall be respectively accredited by a national accreditation body in accordance with the rules defined in ISO 17021 ...</b></p> <p><b>5.4 Obligations of the CFCC notified certification body</b></p> <p><i>The CFCC notified certification body shall:</i></p> <p><i>Carry out forest management/chain of custody certification in accordance with CFCS standards and other relevant documentations within the scope of the valid accreditation;</i></p> <p><i>CNAS S23 (2021)</i></p> <p><i>1.2 Forest certification bodies shall meet the requirements of CNAS-CC02 Requirements for Bodies Certifying Products, Processes and Services of this document, and shall also meet other accreditation rules formulated by CNAS and accreditation criteria and guidelines applicable to product certification bodies.</i></p> <p><i>CNAS replies to questions 23.3.2022</i></p> <p><i>CNAS-SC23 comprises those requirements to the forest certification bodies engaged in FM which are specified by CNAS in accordance with ISO/IEC17021-1, the PEFC requirements to forest certification bodies (including requirements on forest certification personnel), and ISO19011 Guidelines for Auditing Management Systems.</i></p>



**Indufor**

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><b>Conclusion: Minor non-conformity</b></p> <p><b>Justification:</b> The CFCS and CNAS documentations on accreditation requirements are conflicting, because the accreditation body CNAS considers that forest certification shall comply with the procedures of product and service certification and not those of management system certification.</p> <p>In practice CNAS claims that its accreditation rules for forest management certification also cover the requirements of the ISO 17021 standard.</p> <p>CFCC notification requires that CBs are entitled to do certifications within the limits of their accreditation and the notification process allows CFCC to verify this.</p>
Does the scheme documentation include a mechanism for PEFC notification of certification bodies?	Annex 6, 6	Y	<p>CFCC-PRO-01:2022, Annex I</p> <p><b>5.4 Obligations of the CFCC notified certification body</b></p> <p><i>The CFCC notified certification body shall:</i></p> <p><i>Carry out forest management/chain of custody certification in accordance with CFCS standards and other relevant documentations within the scope of the valid accreditation;</i></p> <p><b>5.1The certification body applying for notification from CFCC shall:</b></p> <p><i>Be a legal entity.</i></p> <p><i>Agree to be listed on the publicly available CFCC website including the certification body's identification data and/or other data as specified by CFCC.</i></p> <p><i>Have valid accreditation. The certification body carrying out CFCS forest management certification shall be accredited by CNAS, and the certification body carrying out the chain of custody certification shall be accredited by CNAS or other accreditation bodies which shall be a member of the International Accreditation Forum (IAF) or a member of IAF's special recognition regional groups and implement procedures described in</i></p>



**Indufor**

PEFC benchmark requirement		YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><i>ISO/IEC 17011 and other documents recognized by the above organizations.</i></p> <p><i>Sign a CFCC notification contract with CFCC (refer to Appendix 2).</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The CFCC requires notification of all certification bodies. The procedures for notification are defined in sections 5.3 – 5.5. to Annex I.</p>
Are the procedures for PEFC notification of certification bodies non-discriminatory?	Annex 6, 6	Y	<p>CFCC-PRO-01:2022, Annex 1</p> <p><b>5.2 The CFCC notification conditions shall not discriminate against certification bodies or create trade obstacles.</b></p> <p><b>5.3.</b> Appeals option to CFCC</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> CFCC does not allow discrimination in notification of certification bodies.</p>

## PEFC Checklist (2) - Standard Setting Procedures and Process (PEFC ST 1001:2017)

### 1 Scope

This checklist covers the requirements for standard setting procedures and process as defined in the revised 2017 issue of PEFC ST 1001, *Standard Setting – Requirements*.

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

#### Referred CFCS Documents:

CFCC- 1001:2021	Standard Development Rule, April 20, 2022 (SDR)
CFCC- 02/2022	Standard Development Process and Records, January 13, 2022 (SPDR)
CFCC- 2001:2022	Forest Management Requirements, April 20, 2022 (FMR)
NA	Meeting Minutes-0420.pdf, April 20, 2022
NA	Records of stakeholders feedbacks & CFCC's response on standard revision_CN.pdf

### 2 Checklist

PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>Standardising Body</b>			
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	N	<b>Conclusion: Minor non-conformity</b> <b>Justification:</b> The SDR omits description of the legal status of the standardising body.



PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(b) procedures for keeping documented information,	Procedures	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The procedures for keeping documented information are described in SDR Chapter 9: <i>Record-keeping procedures</i> .
(c) procedures for balanced representation of stakeholders,	Procedures	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The procedures for balanced representation of stakeholders are described in SDR Chapter 7: <i>Mechanism for balanced representation of stakeholders</i> .
(d) the standard-setting process,	Procedures	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The standard-setting process is described in SDR Chapter 6: <i>Standard development process</i> .
(e) the mechanism for reaching consensus, and	Procedures	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The mechanism for reaching consensus is described in SDR Chapter 8: <i>Mechanism for reaching consensus</i> .
(f) review and revision of standard(s)/normative document(s).	Procedures	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The review and revision of standards are described in SDR Chapter 11: <i>Periodic review of standards</i> and SDR Chapter 12: <i>Revision of standards</i> .
5.1.2 The standardising body shall make its standard-setting procedures publicly available and shall review its	Procedures	Y	SDR Chapter 6: <i>Standard development process</i> . ... 6.3 <i>Public announcement of the process</i> . <i>The announcement and invitation shall include: ... f) access to</i>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
standard-setting procedures regularly. The review shall consider feedback from stakeholders.			<p><i>the standard development procedures. CFCC shall review the rule and process of standard development...</i></p> <p>SDR Foreword: <i>CFCC shall periodically review and revise the rule according to relevant PEFC requirements and China's actual situation. Any organization and individual can submit to CFCC suggestions for revising the rule at any time.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR was made publicly available on the CFCC website: <a href="https://www.cfcc.org.cn/manage/findOne/16423401889489704856897306708/%E9%87%8D%E8%A6%81%E9%80%9A%E7%9F%A5/3/25/">https://www.cfcc.org.cn/manage/findOne/16423401889489704856897306708/%E9%87%8D%E8%A6%81%E9%80%9A%E7%9F%A5/3/25/</a></p>
5.2.1 The standardising body shall keep documented information relevant to the standard-setting and review process. Evidence of compliance with the requirements of this standard and the standardising body's own procedures includes:			
(a) Standard-setting procedures,	Procedures	Y	<p>SDR Chapter 9: <i>Record-keeping procedures. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: a) <u>Standard development procedures</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The standard-setting procedures are documented in the SDR.</p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(b) Stakeholder identification mapping,	Procedures	Y	<p>SDR Chapter 9: <i>Record-keeping procedures</i>. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... b) <u>Stakeholder identification mapping</u></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.</p>
(c) Contacted and/or invited stakeholders,	Procedures	Y	<p>SDR Chapter 9: <i>Record-keeping procedures</i>. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... c) <u>Contacted and/or invited stakeholders</u></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.</p>
(d) Stakeholders involved in standard-setting activities including participants in each working group meeting,	Procedures	Y	<p>SDR Chapter 9: <i>Record-keeping procedures</i>. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... d) <u>Stakeholders involved in standard development activities including participants in each working group meeting</u></p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.
(e) Feedback received and a synopsis of how feedback was addressed,	Procedures	Y	SDR Chapter 9: <i>Record-keeping procedures. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... e) <u>Feedback received and a synopsis of how feedback was addressed</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal feedback collection and application processes are not required in time-critical revision of standards.
(f) All drafts and final versions of the standard,	Procedures	Y	SDR Chapter 9: <i>Record-keeping procedures. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... f) <u>All drafts and final versions of the standard</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The standards were made publicly available on the CFCC website ( <a href="https://www.cfcc.org.cn">https://www.cfcc.org.cn</a> ).
(g) Outcomes from working group considerations,	Procedures	Y	SDR Chapter 9: <i>Record-keeping procedures. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... g) <u>Outcomes from working group considerations</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The SDPR includes working group meeting minutes with outcomes of their considerations.
(h) Evidence of consensus on the final version of the standard(s),	Procedures	Y	SDR Chapter 9: <i>Record-keeping procedures. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... h) <u>Evidence of consensus on the final version of the standard(s)</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Justification:</b> The SDPR indicates that the standardising body approved the revised standards unanimously.
(i) Evidence relating to the review process, and	Procedures	Y	<p>SDR Chapter 9: <i>Record-keeping procedures. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... i) <u>Evidence relating to the review process</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The review process has been documented in the SDPR. This includes working group meeting minutes.</p>
(j) Final approval by the standardising body.	Procedures	Y	<p>SDR Chapter 9: <i>Record-keeping procedures. 9.1 CFCC shall keep documented information relevant to the standard development and review process. Evidence of compliance with the requirements of this standard and CFCC's own procedures includes: ... j) <u>Final approval by CFCC</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The final approval by the standardising body has been documented in the SDPR.</p>
5.2.2 Documented information shall be kept until completion of the next review or revision of the standard to which they	Procedures	Y	SDR Chapter 9: <i>Record-keeping procedures. ... 9.2 Documented information shall be kept until completion of the next review or revision of the standard to</i>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
refer. Otherwise the documented information must be kept for a minimum of five years after publication of the standard.			<p><i>which they refer. Otherwise the documented information must be kept for a minimum of five years after publication of the standard.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The process can only be assessed after the time period defined in the benchmark has passed.</p>
5.2.3 Documented information shall be available to interested parties upon request.	Procedures	Y	<p>SDR Chapter 9: <i>Record-keeping procedures. ... 9.3 CFCC has the ownership and management right of all documents and records, which shall be available to any organization and individual upon request.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> Contact details applicable for requesting documented information have been provided on the CFCC website (<a href="https://www.cfcc.org.cn">https://www.cfcc.org.cn</a>).</p>
5.3.1 The standardising body shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard-setting activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, the standardising body shall:			
(a) acknowledge receipt of the complaint or appeal to the complainant,	Procedures	Y	<p>SDR Chapter 13: <i>Dispute Resolution Mechanism. 13.1 CFCC shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard development activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or</i></p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p><i>appeal, CFCC shall: a) <u>acknowledge receipt of the complaint or appeal to the complainant</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The CFCC original checklist response (delivered to the assessor on January 22, 2022) indicates that no complaints or appeals related to the standard-setting activities were received.</p>
(b) gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal,	Procedures	Y	<p>SDR Chapter 13: <i>Dispute Resolution Mechanism. 13.1 CFCC shall establish procedure(s) for dealing with any substantial and process complaints and appeals relating to its standard development activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, CFCC shall: ... b) <u>gather and verify all necessary information to validate the complaint or appeal, evaluate the subject matter of the complaint or appeal impartially and objectively, and make a decision regarding the complaint or appeal</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The CFCC original checklist response (delivered to the assessor on January 22, 2022) indicates that no complaints or appeals related to the standard-setting activities were received.</p>
	Procedures	Y	<p>SDR Chapter 13: <i>Dispute Resolution Mechanism. 13.1 CFCC shall establish procedure(s) for dealing with any substantial and process complaints and</i></p>





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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.			<p><i>appeals relating to its standard development activities. It must make procedure(s) accessible to stakeholders. Upon receipt of a complaint or appeal, CFCC shall: ... c) formally communicate the decision on the complaint or appeal to the complainant and describe the handling process.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The CFCC original checklist response (delivered to the assessor on January 22, 2022) indicates that no complaints or appeals related to the standard-setting activities were received.</p>
5.3.2 The standardising body shall establish at least one contact point for enquiries, complaints and appeals relating to its standard-setting activities. The contact point shall be easy to access and readily available.	Procedures	Y	<p>SDR Chapter 13: <i>Dispute Resolution Mechanism</i>. ... 13.2 CFCC shall establish at least one contact point for enquiries, complaints and appeals relating to its standard development activities. The contact point shall be easy to access and readily available.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> Announcement of the standard revision process included information of a contact point:  <a href="https://www.cfcc.org.cn/manage/findOne/16423401889489704856897306708/%E9%87%8D%E8%A6%81%E9%80%9A%E7%9F%A5/3/25/">https://www.cfcc.org.cn/manage/findOne/16423401889489704856897306708/%E9%87%8D%E8%A6%81%E9%80%9A%E7%9F%A5/3/25/</a></p>
Standard-setting process			

PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
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	Y	<p>SDR Chapter 6: <i>Standard development process. 6.1 Standard proposal. 6.1.1 For the creation of a new standard, CFCC shall develop a proposal including: a) <u>the scope of the standard</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The CFCC did not create a new standard in the rescoped standard-setting process, launched after the first draft report issued by the assessor (August 24, 2021). The scope of the standards that were to be revised was set by the previous operative versions of those standards.</p>
(b) a justification of the need for the standard,	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. 6.1 Standard proposal. 6.1.1 For the creation of a new standard, CFCC shall develop a proposal including: ... b) <u>justification of the need for the standard</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The CFCC did not create a new standard in the rescoped standard-setting process.</p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(c) a clear description of the intended outcomes	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. 6.1 Standard proposal. 6.1.1 For the creation of a new standard, CFCC shall develop a proposal including: ... c) <u>a clear description of the intended outcomes</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The CFCC did not create a new standard in the rescoped standard-setting process.</p>
(d) a risk assessment of potential negative impacts arising from implementing the standard, such as <ul style="list-style-type: none"> <li>• factors that could affect the achievement of the outcomes negatively,</li> <li>• unintended consequences of implementation,</li> <li>• actions to address the identified risks, and</li> </ul>	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. 6.1 Standard proposal. 6.1.1 For the creation of a new standard, CFCC shall develop a proposal including: ... d) <u>a risk assessment of potential negative impacts arising from implementing the standard, such as,</u></i></p> <ul style="list-style-type: none"> <li>• <i>factors that could affect the achievement of the outcomes negatively,</i></li> <li>• <i>unintended consequences of implementation,</i></li> <li>• <i>actions to address the identified risks</i></li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The CFCC did not create a new standard in the rescoped standard-setting process.</p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>(e) a description of the stages of standard development and their expected timetable.</p> <p>NOTE Guidance for development of a proposal and justification is given in ISO Directives, Part 1, Annex C and Annex SL (Appendix 1).</p>	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. 6.1 Standard proposal. 6.1.1 For the creation of a new standard, CFCC shall develop a proposal including: ... e) a description of the stages of standard development and their expected timetable.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> Stages of the standard development and their expected timetable were announced on the CFCC website:  <a href="https://www.cfcc.org.cn/manage/findOne/16423401889489704856897306708/%E9%87%8D%E8%A6%81%E9%80%9A%E7%9F%A5/3/25/">https://www.cfcc.org.cn/manage/findOne/16423401889489704856897306708/%E9%87%8D%E8%A6%81%E9%80%9A%E7%9F%A5/3/25/</a></p>
<p>6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.</p>	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. 6.1 Standard proposal. ... 6.1.2 For the revision of a standard the proposal shall cover at least (a) and (e) of clause 6.1.1.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> See 6.1.1 a: Process, and 6.1.1 e: Process.</p>
<p>6.2.1 The standardising body shall identify stakeholders relevant to the objectives and scope of the standard-setting activities by means of a stakeholder identification mapping exercise. It shall define which stakeholder groups are relevant to the subject matter and why. For each</p>	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. ... 6.2 Stakeholder identification. 6.2.1 CFCC shall identify stakeholders relevant to the objectives and scope of the standard development 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 CFCC</i></p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
stakeholder group the standardising body shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.			<i>shall identify the likely key issues, key stakeholders, and which means of communication would be best to reach them.</i>  <b>Conclusion: Conformity</b>  <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b>  <b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.
<p>6.2.2 Identification of stakeholder groups shall be based on nine major stakeholder groups as defined by Agenda 21 of the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the stakeholder mapping:</p> <ul style="list-style-type: none"> <li>• forest owners,</li> <li>• business and industry,</li> <li>• indigenous people,</li> <li>• non-government organisations,</li> <li>• scientific and technological community,</li> <li>• workers and trade unions.</li> </ul> <p>Other groups shall be added if relevant to the scope of standard-setting activities.</p>	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. ... 6.2 Stakeholder identification. ... 6.2.2 Identification of stakeholder groups shall be based on nine major stakeholder groups as defined by Agenda 21 of the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992. At least the following groups shall be included in the stakeholder mapping:</i></p> <ul style="list-style-type: none"> <li>a) <i>forest owners,</i></li> <li>b) <i>business and industry,</i></li> <li>c) <i>indigenous people,</i></li> <li>d) <i>non-government organizations,</i></li> <li>e) <i>scientific and technological community,</i></li> <li>f) <i>workers and trade unions.</i></li> </ul> <p><i>Other groups shall be added if relevant to the scope of standard development activities.</i></p> <b>Conclusion: Conformity</b>  <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.

PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
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.	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.
6.2.3 The standardising body shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard-setting activities.  NOTE A stakeholder can be both a disadvantaged and a key stakeholder at the same time.	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.2 Stakeholder identification. ... 6.2.3 CFCC shall identify disadvantaged stakeholders and key stakeholders and address any constraints to their participation in standard development activities.</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.
6.3.1 The standardising body shall make a public announcement of the start of the standard-setting process and include an invitation to stakeholders to participate in the process. The announcement shall be made in a timely manner through suitable media, as appropriate, to give stakeholders an opportunity for meaningful contributions.  NOTE 1 <i>In a timely manner</i> means (at the latest) four weeks before the first standard-setting activity is scheduled to occur.	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. CFCC shall make a public announcement on the start of standard development process, including an invitation for participation in a timely manner on website and in other suitable media as appropriate to afford stakeholders (especially key and disadvantaged stakeholders) an opportunity for meaningful contributions.</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
NOTE 2 <i>Through suitable media</i> means at least through the standardising body's website and by email and/or letter to identified stakeholders. Other media includes press releases, news articles, features in trade-press, information sent to branch organisations, social media, digital media, etc.	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal public announcement and stakeholder processes are not mandatory in time-critical revision of standards.
6.3.1 The announcement and invitation shall include:			
(a) overview of the standard-setting process,	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... The announcement and invitation shall include: a) <u>overview of the standard development process</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal public announcement and stakeholder processes are not mandatory in time-critical revision of standards.
(b) access to the proposal for the standard (refer to 6.1),	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... The announcement and invitation shall include: ... b) <u>access to the proposal for the standard</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal public announcement and stakeholder processes are not mandatory in time-critical revision of standards.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(c) information about opportunities for stakeholders to participate in the process,	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... The announcement and invitation shall include: ... c) <u>information about opportunities for stakeholders to participate in the process</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> Normal public announcement and stakeholder processes are not mandatory in time-critical revision of standards.</p>
(d) requests to stakeholders to nominate their representative(s) or themselves to the working group (refer to 6.4). The request to disadvantaged stakeholders and key stakeholders shall be made in a manner that ensures that the information reaches intended recipients and in a format that is easy to understand,	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... The announcement and invitation shall include: ... d) <u>requests to stakeholders to nominate their representative(s) or themselves to the working group. 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</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> Normal public announcement and stakeholder processes are not mandatory in time-critical revision of standards.</p>
(e) explicit invitation and clear instruction on how to submit feedback on the scope and standard-setting process, and	Procedures	Y	<p>SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... The announcement and invitation shall include: ... e) <u>explicit invitation and clear instruction on how to submit feedback on the scope and standard development process</u></i></p>





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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal public announcement and stakeholder processes are not mandatory in time-critical revision of standards.
(f) access to the standard-setting procedures.	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... The announcement and invitation shall include: ... f) <u>access to the standard development procedures.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal public announcement and stakeholder processes are not mandatory in time-critical revision of standards.
6.3.2 The standardising body shall review the standard-setting process based on feedback received in response to the public announcement.	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... CFCC shall review the rule and process of standard development, and establish a temporary WG or adjust the composition of WG based on comments received from the public announcement.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal public announcement and feedback application processes are not mandatory in time-critical revision of standards.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
6.4.1 The standardising body shall establish a permanent or temporary working group or adjust the composition of an already existing working group based on nominations it received. Acceptance and refusal of nominations shall be justified in relation to the requirements for balanced representation of the working group, considerations of an appropriate gender balance, relevance of the organisation, an individual's competence, an individual's relevant experience and resources available for standard-setting.	Procedures	Y	<p>SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.2 Composition. ... The composition of WG should consider: ... b) appropriate sex ratio ... d) stakeholder with relevant domain knowledge and experience</i></p> <p>SDR Chapter 6: <i>Standard development process. ... 6.3 Public announcement of the process. ... CFCC shall review the rule and process of standard development, and establish a temporary WG or adjust the composition of WG based on comments received from the public announcement. <u>The acceptance and refusal of nominations shall be justifiable in relation to requirements for balanced representation of WG and resources available for the standard development.</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
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	Y	<p>SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.2 Composition. ... The composition of WG shall consider: a) balanced number of representatives from environmental, social and economic fields ... d) stakeholder with relevant domain knowledge and experience</i></p> <p>SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.4 Management. ... WG shall not be dominated by any single concerned interest.</i></p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<p>SDR Chapter 7: <i>Mechanism for balanced representation of stakeholders. ... 7.4 Any single concerned stakeholders shall not dominate the standard development process.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</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	Y	<p>SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.2 Composition. ... The composition of WG shall consider: ... d) stakeholder with relevant domain knowledge and experience, e) affected stakeholder, f) stakeholder who can influence the implementation of standards.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
6.4.3 In order to achieve balanced representation, the standardising body shall strive to have all identified stakeholder groups (refer to 6.2) represented. The standardising body shall set targets for the participation of key stakeholders and proactively seek their participation by	Procedures	Y	<p>SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.2 Composition. ... In order to achieve balanced representation, CFCC shall strive to have all identified stakeholder groups represented. CFCC 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.</i></p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
using outreach such as (but not limited to) personal emails, phone calls, meeting invitations etc.			<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
NOTE When a stakeholder group is not represented and key stakeholders cannot be encouraged to participate, the standardising body may consider alternative options.	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.
6.4.4 Activities of the working group shall be organised in an open and transparent manner where:			
(a) working drafts shall be available to all members of the working group,	Procedures	Y	SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.5 Working principles. ... a) ... The working drafts shall be available to all members of WG</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.
(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	Y	SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.5 Working principles. ... a) all members of WG shall be provided with meaningful opportunities to contribute to the development or revision of the standard and submit comments to the working drafts.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.
(c) feedback and views given by any member of the working group shall be considered in an open and transparent way where the outcome of these considerations is recorded.	Procedures	Y	<p>SDR Chapter 5: <i>Standard development organizations. ... 5.3 Working group. ... 5.3.5 Working principles. ... b) comments and views submitted by any member of WG shall be considered in an open and transparent manner and their resolution and proposed changes shall be recorded</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
6.4.5 The decision of the working group to recommend the final draft for formal approval shall be taken on the basis of consensus. In order to determine whether there is any sustained opposition, the working group can utilise the following methods:			
(a) face-to face meeting(s) where there is a verbal yes/no vote, a show of hands for a yes/no vote; a statement on consensus from the Chair when there are no dissenting voices or hands (votes); a formal ballot, etc.,	Procedures	Y	<p>SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.2 In order to reach a consensus, WG can utilize the following alternative processes to establish whether there is opposition: a) <u>a face-to face meeting where there is a verbal yes/no vote, show of hands for a yes/no vote; a statement on consensus from the Chair where there are no dissenting voices or hands (votes); a formal balloting process etc.</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.
(b) telephone conference meeting(s) where there is a verbal yes/no vote,	Procedures	Y	SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.2 In order to reach a consensus, WG can utilize the following alternative processes to establish whether there is opposition: ... b) <u>a telephone conference meeting where there is a verbal yes/no vote</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.
(c) e-mail request to the working group for agreement or objection where the members provide a formal (written) response (vote),	Procedures	Y	SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.2 In order to reach a consensus, WG can utilize the following alternative processes to establish whether there is opposition: ... c) <u>an email meeting where all members of WG agree to do so (a proxy for a vote)</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(d) combinations of these methods.	Procedures	Y	<p>SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.2 In order to reach a consensus, WG can utilize the following alternative processes to establish whether there is opposition: ... d) <u>combinations thereof.</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
6.4.6 Where a vote is used in decision-making, the standard-setting procedures shall determine and include decision-making thresholds that quantifies consensus. The threshold must be consistent with the consensus definition (refer to 3.1). However, a majority vote cannot override sustained opposition in order to achieve consensus.	Procedures	Y	<p>SDR Chapter 3: <i>Terms and definitions. ... 3.1 Consensus. General agreement characterized by the absence of sustained opposition to substantial issues by any important part of the concerned interests and by a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments.</i></p> <p>SDR Chapter 8: <i>Mechanism for reaching consensus. 8.1 ... <u>Consensus need not imply unanimity, but at least 75% of all members agree.</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
6.4.7 When there is sustained opposition to a substantial issue, the issue shall be resolved using the following methods:			



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(a) finding a compromise through discussion and negotiation on the disputed issue within the working group,	Procedures	Y	<p>SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.3 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s): a) <u>firstly, discussion and negotiation on the disputed issue within WG in order to find a compromise</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
(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	Y	<p>SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.3 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s): ... b) <u>secondly, direct negotiation between the stakeholder(s) submitting the objection and stakeholders with different views on the disputed issue in order to find a compromise</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
(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	Y	<p>SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.3 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be</i></p>





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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.			<p><i>resolved using the following mechanism(s): ... c) <u>thirdly, additional round(s) of public consultation (if necessary) where further stakeholder input can help to achieve consensus on unresolved issues. The additional public consultation will cover key stakeholders and will last 15 days</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
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	Y	<p>SDR Chapter 8: <i>Mechanism for reaching consensus. ... 8.3 In the case of a negative vote which represents sustained opposition to any important part of the concerned interests surrounding a substantive issue, the issue shall be resolved using the following mechanism(s): ... d) <u>finally, the start of Dispute Resolution Mechanism.</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.</p>
6.5.1 The standardising body shall organise public consultation on the enquiry draft and shall ensure that:			



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(a) the start and the end dates of public consultation are announced in a timely manner through suitable media, NOTE <i>In a timely manner</i> means (at the latest) the day before the start of public consultation.	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... b) <u>The start and the end of the public consultation shall be announced in a timely manner in suitable media, such as website, TV, email, mail etc.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
(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	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... c) <u>A direct invitation to comment on the enquiry draft is sent to each stakeholder identified by stakeholder identification mapping aiming for a balanced participation of stakeholder groups.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
(c) invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand,	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... d) <u>Invitations are sent to disadvantaged and key stakeholders by methods that ensure they reach recipients and are easy to understand.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
(d) the enquiry draft is made publicly available,	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... e) <u>During the public consultation, the enquiry draft shall be public available.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
(e) public consultation is for at least 60 days,	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... f) <u>The public consultation is for at least 60 days.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
(f) all feedback is considered by the working group in an objective manner, and	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... f) <u>The public consultation is for at least 60 days. All comments received during the process of public consultation shall be considered by WG in an objective manner.</u></i>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
(g) a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.  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.	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... g) <u>a synopsis of feedback is compiled for each material issue, including the outcome of considering the issue. The synopsis is made publicly available (e.g. on a website) and is sent to each stakeholder/party that gave feedback.</u></i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
6.5.2 For new standards the standardising body shall organise a second round of public consultation lasting at least 30 days.	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.6 Public consultation. ... i) <u>After the first public consultation, the revised revisions to the standard should be reflected in the standard text and continue to organize a second round of public consultation for at least 30 days.</u></i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Justification:</b> The CFCC did not create a new standard in the rescoped standard-setting process.
<p>6.6 The standardising body shall organise pilot testing of new standard(s) to assess the clarity, auditability and feasibility of the requirements. The working group shall consider the outcome of pilot testing.</p> <p>NOTE Pilot testing is not required for revision of an existing standard when experience from its usage can substitute for pilot testing.</p>	Procedures	Y	<p>SDR Chapter 5: <i>Standard development organizations. ... 5.2 Working group. ... 5.2.3 Responsibility. The responsibility of WG includes: a) organizing to draft, discuss and revise the standard ... c) participating in pilot testing</i></p> <p>SDR Chapter 6: <i>Standard development process. ... 6.5 Pilot testing. A pilot testing shall be organized, and the testing site and the plan shall be determined based on specific conditions and aspects covered by the standard. After pilot testing, the revision and improvements should be made on the basis of testing results.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The CFCC did not create a new standard in the rescoped standard-setting process.</p>
<b>Approval and Publication</b>			
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	Y	<p>SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. 6.7.1 Formal approval of standards. CFCC shall approve the standard(s)/normative document(s) formally when there is evidence of consensus among the working group.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal working group process is not mandatory in time-critical revision of standards.
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	Y	SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. ... 6.7.2 Publication and availability of standards. 6.7.2.1 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 CFCC.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The standards were made publicly available on the CFCC website ( <a href="https://www.cfcc.org.cn">https://www.cfcc.org.cn</a> ).
7.2.2 Standard(s) shall include:			
(a) identification and contact information for the standardising body,	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. ... 6.7.2 Publication and availability of standards. ... 6.7.2.2 Standard(s) shall include: a) <u>identification and contact information of CFCC</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR includes identification and contact information of the CFCC as the standardising body.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
(b) official language of the standard,	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. ... 6.7.2 Publication and availability of standards. ... 6.7.2.2 Standard(s) shall include: ... b) <u>official language of the standard</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR includes the following statement: <i>The official version of the document is in Chinese.</i>
(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	Y	SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. ... 6.7.2 Publication and availability of standards. ... 6.7.2.2 Standard(s) shall include: ... c) <u>a note that when there is inconsistency between versions, the English version of the standard as endorsed by the CFCC Council is the reference</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is in line with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR includes the following statement: <i>When there is doubt in regard to language interpretation, the English version is the reference.</i>
(d) The approval date and the date of next periodic review	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. ... 6.7.2 Publication and availability of standards. ... 6.7.2.2 Standard(s) shall include: ... d) <u>The approval date and the date of next periodic review.</u></i>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
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.			<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR includes the approval date and the date of the next periodic review.
7.2.3 Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any)	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. ... 6.7.2 Publication and availability of standards. ... 6.7.2.3 <u>Printed copies shall be made available upon request at a price that covers no more than administrative costs (if any).</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The CFCC response communicated to the assessor on April 22, 2022, states that hard copies of the FMR are distributed free of charge during the standard trainings and meetings organized/supported by CFCC and that they are also available at CFCC per request.
7.2.4 The standardising body shall make the development report (refer to PEFC GD 1007) publicly available	Procedures	Y	SDR Chapter 6: <i>Standard development process. ... 6.7 Approval and publication. ... 6.7.2 Publication and availability of standards. ... 6.7.2.4 <u>CFCC shall make the development report publicly available.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.





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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
	Process	N	<p><b>Conclusion: Minor non-conformity</b></p> <p><b>Justification:</b> The required summary of major changes and their justification for revised standards (PEFC GD 1007, section 6.1.3 d, subpoint f) has not been made publicly available.</p> <p>The rest of the development report contents required by the PEFC GD 1007 have either been made public as a part of the SPDR or are not applicable in the case of a time-critical revision.</p>
<b>Periodic review of standards</b>			
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	Y	<p>SDR Chapter 11: <i>Standard development process. 11.1 General. 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 organized to obtain further feedback and input.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The process timeline conforms with the PEFC ST 1001:2017 requirements. The documentation submitted by the CFCC for the first assessment round (see Indufor's first draft report of August 24, 2021) described the original gap analysis.</p> <p><b>Comment:</b> There is no information on feedback received during the standard implementation. It is recommended that this aspect is reported explicitly by the standardizing body in relation to future revision rounds.</p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>8.2.1 The standardising body shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of the standardising body and/or PEFC National Governing Body with clear directions for providing feedback.</p> <p>NOTE Feedback can be sent in various formats: comments, requests for clarification and/or interpretation, complaints, etc.</p>	Procedures	Y	<p>SDR Chapter 11: <i>Standard development process. ... 11.2 Feedback mechanism. 11.2.1 CFCC shall establish and maintain a permanent mechanism for collecting and recording feedback on a standard. This mechanism shall be accessible on the website of CFCC with clear directions for providing feedback.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDPR includes particulars of permanent feedback mechanisms established during the process.</p>
<p>8.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.</p>	Procedures	Y	<p>SDR Chapter 11: <i>Standard development process. ... 11.2 Feedback mechanism. ... 11.2.2 All feedback received through all channels, including meetings, training courses, etc. shall be recorded and considered.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> According to the CFCC only two cases of feedback were received. Their records including the CFCC response was communicated to the assessor on April 22, 2022 (Document: <i>Records of stakeholders feedbacks &amp; CFCC's response on standard revision_CN.pdf</i>)</p>
<p>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</p>	Procedures	Y	<p>SDR Chapter 11: <i>Standard development process. ... 11.3 Feedback mechanism. 11.3.1 At the start of a review, CFCC shall evaluate the standard against appropriate PEFC International standards, national laws and</i></p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
other relevant standards to identify potential gaps in the standard.			<i>regulations, and other relevant standards to identify potential gaps in the standard.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The documentation submitted by the CFCC for the first assessment round (see Indufor's first draft report of August 24, 2021) described the original gap analysis.
8.3.2 The standardising body shall consider the latest scientific knowledge, research and relevant emerging issues.	Procedures	Y	<i>SDR Chapter 11: Standard development process. ... 11.3 Feedback mechanism. ... 11.3.2 CFCC shall consider the latest scientific knowledge, research and relevant emerging issues.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The requirement is fulfilled through the expertise included in the compositions of the working groups addressing standard revision, documented in the SDPR
8.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, the standardising body shall organise stakeholder consultation to determine whether stakeholders see a need for revising the standard. The standardising body shall include the gap analysis in the stakeholder consultation.	Procedures	Y	<i>SDR Chapter 11: Standard development process. ... 11.4 Stakeholder consultation. 11.4.1 Where the feedback and the gap analysis do not identify a need to revise the standard, CFCC shall organize stakeholder consultation to determine whether stakeholders see a need for revising the standard. CFCC shall include the gap analysis in the stakeholder consultation.</i> <b>Conclusion: Conformity</b>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.
8.4.2 At the start of a review, the standardising body shall update the stakeholder identification mapping (refer to clause 6.2).	Procedures	Y	SDR Chapter 11: <i>Standard development process. ... 11.4 Stakeholder consultation. ... 11.4.2 At the start of a review, CFCC shall update the stakeholder identification mapping (refer to clause 6.2.1)</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.
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	Y	SDR Chapter 11: <i>Standard development process. ... 11.4 Stakeholder consultation. ... 11.4.3 CFCC shall organize:</i> <i>a) a public consultation period of at least 30 days (following the requirements of clause 6.6) and/or,</i> <i>b) stakeholder meetings.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> A normal public consultation process is not mandatory in time-critical revision of standards.
(b) stakeholder meetings.	Procedures	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017. See 8.4.3 (a) above.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal stakeholder consultation processes are not mandatory in time-critical revision of standards.
8.4.4 The standardising body shall announce the review in a timely manner (refer to 6.3).	Procedures	Y	<i>SDR Chapter 11: Standard development process. ... 11.4 Stakeholder consultation. ... 11.4.4 CFCC shall announce the review in a timely manner (refer to 6.3).</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Normal public announcement process is not mandatory in time-critical revision of standards.
8.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, the standardising body shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.	Procedures	Y	<i>SDR Chapter 11: Standard development process. ... 11.5 Decision-making. 11.5.1 Based on the feedback received during the period of a standard's implementation, the outcome of the gap analysis and the consultations, CFCC shall decide whether to reaffirm the standard or whether a revision of the standard is necessary.</i>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> The revision of the standards was done as time-critical revision, instructed by PEFC International (see 9.3.2 b).
8.5.2 The decision shall be made at the highest decision-making level of the standardising body	Procedures	Y	SDR Chapter 11: <i>Standard development process. ... 11.5 Decision-making. ... 11.5.2 The decision shall be made at the highest decision-making level of CFCC</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> The revision of the standards was done as time-critical revision, instructed by PEFC International (see 9.3.2 b).
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	Y	SDR Chapter 11: <i>Standard development process. ... 11.5 Decision-making. ... 11.5.3 Where the decision is to reaffirm a standard, CFCC shall provide a justification for the decision and make the justification publicly available.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> No decisions to reaffirm standards were made during the process.



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
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	Y	<p>SDR Chapter 11: <i>Standard development process. ... 11.5 Decision-making. ... 11.5.4 Where the decision is to revise the standard, CFCC shall specify the type of revision.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The revision of the standards was done as time-critical revision, instructed by PEFC International (see 9.3.2 b).</p>
<b>Revision of standards</b>			
9.1 Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6. A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.	Procedures	Y	<p>SDR Chapter 12: <i>Standard development process. 12.1 Normal revision. Procedures for revision of standard(s)/normative document(s) shall conform to those stated in section 6.</i></p> <p><i>A normal revision can occur at the periodic review, or between periodic reviews, but does not include editorial revisions and time-critical revisions.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The revision of the standards was done as time-critical revision.</p>
9.2 Editorial revisions can be made without triggering the normal revision process. The standardising body shall	Procedures	Y	<p>SDR Chapter 12: <i>Standard development process. ... 12.2 Editorial revision. Editorial revisions can be made without triggering the normal revision process.</i></p>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
approve the editorial changes formally and publish an amendment or a new edition of the standard.			<p><i>CFCC shall approve the editorial changes formally and publish an amendment or a new edition of the standard.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: Not applicable</b></p> <p><b>Justification:</b> The revision of the standards was done as time-critical revision.</p>
9.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.	Procedures	Y	<p>SDR Chapter 12: <i>Standard development process. ... 12.3 Time-critical revision. 12.3.1 A time-critical revision is a revision between two periodic reviews using a fast-track process.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>
	Process	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The applied time-critical revision process conforms with the PEFC ST 1001:2017 definition.</p>
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	Y	<p>SDR Chapter 12: <i>Standard development process. ... 12.3 Time-critical revision. ... 12.3.2 A time-critical revision can be conducted only in the following situations: a) <u>Change in national laws and regulations affecting compliance with PEFC International requirements</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p>





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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Time-critical revision was instructed by PEFC International (see 9.3.2 b).
(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	Y	SDR Chapter 12: <i>Standard development process. ... 12.3 Time-critical revision. ... 12.3.2 A time-critical revision can be conducted only in the following situations: ... b) <u>Instruction by PEFC International to comply with specific or new PEFC requirements within a timescale that is too short for a normal revision.</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> Time-critical revision was instructed to the CFCC by PEFC International through email communication on December 7, 2021.
9.3.3 The time-critical revision shall follow these steps:			
(a) The standardising body shall draft the revised standard,	Procedures	Y	SDR Chapter 12: <i>Standard development process. ... 12.3 Time-critical revision. ... 12.3.3 The time-critical revision shall follow these steps: a) <u>CFCC shall draft the revised standard</u></i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Justification:</b> The CFCC drafted the revised standards with inputs from working groups.
(b) The standardising body may consult stakeholders, but it is not mandatory,	Procedures	NA	<p>SDR Chapter 12: <i>Standard development process. ... 12.3 Time-critical revision. ... 12.3.3 The time-critical revision shall follow these steps: ... b) CFCC may consult stakeholders, but it is not mandatory</i></p> <p><b>Conclusion: NA</b></p> <p><b>Justification:</b> The PEFC ST 1001:2017 guidelines are optional herein and place no mandatory requirements to the procedures. The SDR is nevertheless congruent with the PEFC ST 1001:2017.</p>
	Process	NA	<p><b>Conclusion: NA</b></p> <p><b>Justification:</b> The PEFC ST 1001:2017 guidelines are optional herein and place no mandatory requirements to the process. However, the CFCC participated stakeholders in the process through applying working groups.</p>
(c) The revised standard shall be approved formally at the highest appropriate decision-making level of the standardising body,	Procedures	Y	<p>SDR Chapter 12: <i>Standard development process. ... 12.3 Time-critical revision. ... 12.3.3 The time-critical revision shall follow these steps: ... c) <u>The revised standard shall be approved formally at the highest appropriate decision-making level of CFCC</u></i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.</p> <p><b>Comment:</b> It is recommended that the appropriate decision-making level (i.e., the body responsible of the process) is defined in the SDR.</p>
	Process	Y	<b>Conclusion: Conformity</b>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
			<b>Justification:</b> The approval was done by the CFCC board meeting. (Document: <i>Meeting Minutes-0420.pdf</i> )
(d) The standardising body shall explain the justification for the urgent change(s) and make the justification publicly available.	Procedures	Y	SDR Chapter 12: <i>Standard development process. ... 12.3 Time-critical revision. ... 12.3.3 The time-critical revision shall follow these steps: ... d) CFCC shall explain the justification for the urgent change(s) and make the justification publicly available.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	NA	<b>Conclusion: Not applicable</b> <b>Justification:</b> Time-critical revision was instructed by PEFC International (see 9.3.2 b).
9.4.1 A revision shall define the application date and transition period of the revised standard(s)/normative document(s).	Procedures	Y	SDR Chapter 12: <i>Standard development process. ... 12.4 Application and transition of revised standards. 12.4.1 A revision shall define the application date and transition period of the revised standard(s)/ normative document(s).</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR and the FDR include the defined application dates and transition periods.
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	Procedures	Y	SDR Chapter 12: <i>Standard development process. ... 12.4 Application and transition of revised standards. ... 12.4.2 An application date shall not be more than one year after the publication of the standard.</i>



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PEFC benchmark requirement	Assess. basis*	YES / NO	Reference to system documentation (including quotation of relevant text)
document(s), introduction of change(s), information dissemination and training.			<b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The application date April 20, 2022, is marked in the FMR.
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	Y	SDR Chapter 12: <i>Standard development process. ... 12.4 Application and transition of revised standards. ... 12.4.3 The transition period shall not exceed one year.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The SDR is congruent with the PEFC ST 1001:2017.
	Process	Y	<b>Conclusion: Conformity</b> <b>Justification:</b> The transition period of the FMR is until July 20, 2022, as marked in the FMR document.

## PEFC Checklist (3) - Sustainable Forest Management (PEFC ST 1003:2018)

### 1 Scope

This checklist covers requirements for sustainable forest management as defined in PEFC ST 1003:2018, Sustainable Forest Management – Requirements. Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

#### Referred CFCS Documents:

CFCC- 2001:2022	Forest Management Requirements, April 20, 2022 (FMR)
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### 2 Checklist

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>Context of the national standard and the organisations applying a PEFC endorsed standard</b>		
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.	Y	FMR Chapter 1, <i>Scope</i> : <i>This document specifies the requirements to be met for the certification of sustainable forest management. This document is applicable for the auditing and assessment of the forest management performance for all forest management units by the forest certification bodies.</i>  FMR Chapter 3, 3.1 <i>Forest management unit</i> : <i>A forest management entity with legal personality, which has forests with a certain area and clear boundaries and can carry out forest management operation according to a forest management plan and management targets.</i>  <b>Conclusion: Conformity</b>  <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
b) be clear, performance based and auditable;	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is clearly written and auditable. It is also performance based, though requirements of some individual standards remain relatively general. These nevertheless meet the requirements of the PEFC ST 1003:2018 unless specified otherwise in individual conclusions.</p>
c) apply to activities of all forest operators in the defined forest area who have an impact on achieving compliance with the requirements;	Y	<p>FMR Chapter 1, <i>Scope: This document specifies the requirements to be met for the certification of sustainable forest management. This document is applicable for the auditing and assessment of the forest management performance for all forest management units by the forest certification bodies.</i></p> <p>FMR Chapter 3, 3.1 <i>Forest management unit: A forest management entity with legal personality, which has forests with a certain area and clear boundaries and can carry out forest management operation according to a forest management plan and management targets.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is applied to all forest operations that have relevance for achieving compliance with the standards' requirements, thus being in line the PEFC ST 1003:2018.</p>
d) require record-keeping that provides evidence of compliance with the requirements of the forest management standards;	Y	<p>FMR Chapter 4, 4.9 <i>Forest monitoring and documentation, 4.9.3.2: Forest management process records shall be established and kept to prove that they meet the requirements of this document.</i></p> <p>FMR Chapter 4, 4.9 <i>Forest monitoring and documentation, 4.9.3.3: These records shall be kept for at least 5 years.</i></p> <p>In addition, the following individual standards under FMR Chapter 4 include record-keeping requirements: 4.1.2.2 (violation of laws), 4.2.1.2 (forest management unit boundaries), 4.4.1.4. (forest management plan), 4.5.7.3 (harvesting volumes and sites), 4.6.1.1 (mapping of rare species), 4.7.2.3 (buffer zones), 4.7.3.4 (chemical use), 4.7.4.2 (exotic species use)</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		and its ecological impact), 4.8.2.5 (forest fires), 4.9.1.2 (monitoring activities), 4.10.1.4 (internal audit), 4.10.2.5 (management review). <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR stipulates record-keeping that is sufficient for providing evidence of compliance with the FMR requirements, thus being in line the PEFC ST 1003:2018.
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;  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 <a href="http://www.pefc.org">www.pefc.org</a> .	Y	FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i> , 4.9.3.4: <i>Shall provide relevant documents to a CFCC chain of custody certified customer to ensure that all forest products leaving the certified area can be identified so that their origin can be determined. The documentation provided by the forest manager for chain of custody shall:</i>  a) <i>apply “100% CFCC certified” or CFCC mutually recognized forest certification schemes specific claim as claim to be used to communicate the origin of products in an area covered by the standard to customers with a CFCC chain of custody; ...</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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;	Y	FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i> , 4.9.3.4: <i>... The documentation provided by the forest manager for chain of custody shall: ...</i>  b) <i>indicate 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% CFCC certified” or CFCC mutually recognized forest certification schemes specific claim; ...</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
g) require that claims on the origin of products in an area covered by the standard are only made by forest	Y	FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i> , 4.9.3.4: <i>... The documentation provided by the forest manager for chain of custody shall: ...</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
owners/managers covered by a PEFC recognised certificate issued against the standard;		<p>c) <i>indicate that claims on the origin of products in an area covered by the standard are only made by forest owners/managers covered by a CFCC recognised certificate issued against the standard; ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
h) specify requirements concerning the information which need to be provided to a PEFC chain of custody certified customer;	Y	<p>FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i>, 4.9.3.4: ... <i>The documentation provided by the forest manager for chain of custody shall: ...</i></p> <p>d) <i>include the following information:</i></p> <ul style="list-style-type: none"> <li>• <i>the name of the organization,</i></li> <li>• <i>the identification of the product(s),</i></li> <li>• <i>the quantity delivered for each product covered by the documentation,</i></li> <li>• <i>the date of invoicing (in the case of sale to a third party) or the date of transfer to a processing site (in the case of a transfer within the same organization),</i></li> <li>• <i>the official declaration on the category of material (100% CFCC certified or 100% PEFC certified) specifically for each product bearing the CFCC or PEFC claim covered by the document,</i></li> <li>• <i>the number of the forest management certificate, or other document attesting to the certified status of the organization.</i></li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR generally reflects the requirements of the PEFC ST 1003:2018. In addition, relevant national laws and regulations are listed in FMR Appendix A and relevant international conventions to which China is a signatory are listed in FMR Appendix B.</p>
4.2 Understanding the needs and expectations of affected stakeholders		





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
The standard requires that the organisation shall determine:		
a) the affected stakeholders that are relevant to the sustainable forest management;	Y	<p>FMR Chapter 3, 3.2 <i>Local community</i>: A social group composed by residents that inhabit the forest or surrounding areas, whose interests are impacted by the forest.</p> <p>FMR Chapter 3, 3.4 <i>Stakeholder</i>: A group or individual who has direct or indirect interests related to or impacted by forest management, e.g. government organizations, local communities, forest workers, investors, environmental protection organizations, consumers and the general public etc.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The stakeholder groups are determined generally in the FMR, and practical implementation of the standards requires that the individual stakeholders are identified by the forest management units.</p>
b) the relevant needs and expectations of these stakeholders.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.1: <i>Local residents, especially minority nationalities, shall be consulted with and consensus shall be reached when it is necessary to zone and protect forest land with special cultural, ecological, economic or religious significance to them.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.7.2: <i>Rights of participation in forest management planning by local residents, especially minority nationalities, shall be appropriately ensured.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.3: <i>A communication and consultation mechanism shall be built with relevant agencies through involvement of local communities, especially minority nationalities.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.3: <i>Opinions of administrators, management units, local communities and other stakeholders are extensively solicited in the process of developing the forest management plan.</i></p> <p>FMR section 4.2.2 stipulates that disputes and interest conflicts are settled for a forest management unit to pass certification, which requires understanding of stakeholder needs.</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>Standards 4.5.8.3 and 4.5.8.4 require stakeholder consultations in forest conversion to artificial forest and afforestation of ecologically important non-forest land.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
4.3 Determining the scope of the management system		
4.3.1 The standard requires that the organisation shall determine the boundaries and applicability of the management system to establish its scope.	Y	<p>FMR Chapter 1, <i>Scope</i>: ... <i>This document is applicable for the auditing and assessment of the forest management performance for all forest management units by the forest certification bodies.</i></p> <p>FMR Chapter 3, 3.1 <i>Forest management unit</i>: <i>A forest management entity with legal personality, which has forests with a certain area and clear boundaries and can carry out forest management operation according to a forest management plan and management targets.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
4.3.2 The standard requires that forest management shall comprise the cycle of inventory and planning, implementation, monitoring and evaluation, and shall include an appropriate assessment of the social, environmental and economic impacts of forest management practices. This shall form a basis for a cycle of continuous improvement.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.3.2: <i>The forest management plan shall be periodically revised (less than 10 years) according to forest resources monitoring results, latest science and technology and policy information, including latest market and economic activities related to timber, non timber forest products and forest services, as well as the change of environmental, social and economic circumstances.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.1.1: <i>The forest management unit shall analyze the potential impact of forest management activities on the environment based on the scale and intensity of its forest management and forest resource features.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.1.2: <i>According to the results of analysis, forest operational means shall be adjusted or improved by adopting specified ways and means...</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		FRM Chapter 4, 4.9 <i>Forest monitoring and documentation</i> provides further requirements for monitoring strategy and indicators. <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
5. Leadership		
5.1 The standard requires that the organisation shall provide a commitment:		
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system;	Y	FRM Chapter 4, 4.1 <i>Legal obligations</i> , 4.1.3.1: <i>Forest managers shall demonstrate a long-term commitment to comply with the requirement of this standard and other applicable requirements of the certification system.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
b) to continuously improve the sustainable forest management system.	Y	FRM Chapter 4, 4.1 <i>Legal obligations</i> , 4.1.3.2: <i>Forest managers shall demonstrate a long-term commitment to continuously improve the sustainable forest management system.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018. Forest manager is interpreted herein as an equivalent to the organization, i.e., the certificate holder.
5.2 The standard requires that this commitment shall be publicly available.	Y	FRM Chapter 4, 4.1 <i>Legal obligations</i> , 4.1.3.3: <i>The commitment shall be publicly available.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
5.3 The standard requires that responsibilities for sustainable forest management shall be clearly defined and assigned.	Y	FRM Chapter 4, 4.4 <i>Forest management plan</i> , 4.4.2.1: <i>The organizational structure and division of responsibilities of the forest management unit shall cover all contents of the forest management scheme.</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.2: <i>The preparation of forest management plan shall be based on ... long term forestry planning, the size and use of the forest area and accurate forest resources information.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.3.2: <i>The forest management plan shall be periodically revised (less than 10 years) according to forest resources monitoring results, latest science and technology and policy information, including latest market and economic activities related to timber, non timber forest products and forest services, as well as the change of environmental, social and economic circumstances.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> Although not directly stipulated by the FMR, identification of risks and opportunities involved in sustainable forest management compliance is practically necessitated by the requirements placed for forest management planning. The FMR requirements are thus comparable with those of the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.2: <i>The preparation of forest management plan shall be based on ... accurate forest resources information.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.3.2: <i>The forest management plan shall be periodically revised (less than 10 years) according to forest resources monitoring results ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR necessitates regular forest resources mapping as the basis for forest management planning, conforming to the PEFC ST 1003:2018 requirements.</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
6.2 Management plan		
6.2.1 The standard requires that management plans shall be:		
a) elaborated and periodically updated or continually adjusted;	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.3.2: <i>The forest management plan shall be periodically revised (less than 10 years) ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
b) appropriate to the size and use of the forest area;	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.2: <i>The preparation of forest management plan shall be based on ... the size and use of the forest area ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
c) based on applicable local, national and international legislation as well as existing land-use or other official plans; and	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.2: <i>The preparation of forest management plan shall be based on the applicable local, national and international legislation, local land spatial planning, long term forestry planning, the size and use of the forest area ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
d) adequately covering forest resources.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.2: <i>The preparation of forest management plan shall be based on ... accurate forest resources information.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> While the FMR does not explicitly list forest resources information among the required contents of a management plan, the planning process is required to be based on accurate forest resources information. This practically necessitates covering forest resources in the management plan.</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
6.2.2 The standard requires that management plans shall take into account the different uses or functions of the managed forest area.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.6 <i>The forest management plan shall take into account the different uses or functions of the managed forest area.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.2: <i>The preparation of forest management plan shall be based on ... the size and use of the forest area and accurate forest resources information.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.4: <i>The contents of the forest management plan should include the following contents:</i></p> <ul style="list-style-type: none"> <li>- <i>Forest management objectives;</i></li> <li>...</li> <li>- <i>Necessary charts and maps related to forest management.</i></li> </ul> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.1: <i>The forest management unit shall develop an annual harvesting amount based on the principle of forest recourse consumption being less than its growth, reasonable management and sustainable use.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p> <p><b>Comment:</b> It is recommended that the requirement to include a description of the current forest management unit into the forest management plan is made explicit in the FMR. It is also recommended that the language of the FMR standard 4.4.1.4 is revised so that it explicitly requires the listed contents to be included in the forest management plan (<i>should</i> vs. <i>shall</i>).</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	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.1: <i>A diversified economy based on sustainable use of various timber and non-timber forest products, such</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
commercial use of non-wood forest products at a level which can have an impact on their long-term sustainability.		<p><i>as forest fruit, oil plants, food, beverages, herbs and materials for chemical industry etc. shall be implemented.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.4: <i>Use of timber and non-timber forest products shall not exceed the allowable level for sustainable development.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.4: <i>The contents of the forest management plan should include the following contents:</i></p> <p>...</p> <ul style="list-style-type: none"> <li>- <i>Planning and design of forest cultivation and ecological restoration;</i></li> <li>- <i>Planning and design of forest harvesting and regeneration;</i></li> <li>- <i>Forest health and forest protection;</i></li> <li>- <i>Biodiversity conservation;</i></li> </ul> <p>...</p> <p>FRM Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.3: <i>Measures shall be adopted to promote the diversification of the structure of the forest stand and strengthen its stability.</i></p> <p>FRM Chapter 4, sections 4.6–4.8 specify further requirements for biodiversity conservation, environmental impact and forest protection.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR meets the requirements of the PEFC ST 1003:2018.</p>
6.2.6 The standard requires that management plans shall take into account the results of scientific research.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.3.2: <i>The forest management plan shall be periodically revised (less than 10 years) according to ... latest science and technology and policy information ...</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	FMR Chapter 4, 4.4 <i>Forest management plan</i> , 4.4.1.5: <i>On the premise of information permission, the forest management unit shall disclose the main contents of the forest management plan, including the scope and scale of forest management, main forest management measures and other information.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	FMR Chapter 4, 4.4 <i>Forest management plan</i> , 4.4.1.5: <i>On the premise of information permission, the forest management unit shall disclose the main contents of the forest management plan, including the scope and scale of forest management, main forest management measures and other information.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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 "legislation applicable to forest management" is defined by the VPA agreement.	Y	FMR Chapter 4, 4.1 <i>Legal obligations</i> , 4.1.1.1: <i>Forest management units shall take corresponding measures to ensure that applicable national laws and regulations (see Appendix A) and international conventions (see Appendix B) are effectively identified, obtained and updated in a timely manner.</i>  FMR Chapter 4, 4.1 <i>Legal obligations</i> , 4.1.1.2: <i>Forest management units shall comply with applicable national laws and regulations and international conventions on forest management.</i>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.1 <i>Legal obligations</i>, 4.1.1.3: <i>Forest management units that have violated laws have taken timely corrective measures according to the laws, which are kept on file.</i></p> <p>FMR Chapter 4, 4.1 <i>Legal obligations</i>, 4.1.2.1: <i>The forest management unit has taken effective and tangible measures to protect the forest area from illegal logging, illegal settlement, deforestation and other unauthorized activities.</i></p> <p>FMR Chapter 4, 4.1 <i>Legal obligations</i>, 4.1.2.2: <i>Measures have been taken according to law to correct violations in a timely manner and recorded.</i></p> <p>Appendix A and Appendix B list the relevant national laws and regulations, and the international conventions, respectively.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> While the FMR does not explicitly state that the organisation must determine how the compliance obligations by the identified laws apply to the organisation, this is nevertheless a practical requirement resulting from standards 4.1.1.2, 4.1.1.3, 4.1.2.1 and 4.1.2.2.</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.	Y	<p>FMR Chapter 4, 4.1 <i>Legal obligations</i>, 4.1.1.2: <i>Forest management units shall comply with applicable national laws and regulations and international conventions on forest management.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR focuses on stipulation of corrective measures resulting from legal violations instead of explicitly requiring that the organisations should comply with the applicable legislation.</p>
6.3.1.3 The standard requires that where no anti-corruption legislation exists, the organisation must take alternative anti-corruption measures appropriate to the risk of corruption.	NA	<p>The anti-corruption legislation in China consists of <i>Supervision Law of the People's Republic of China</i>, <i>Anti-unfair Competition law</i>, <i>Criminal Law of the People's Republic of China</i>, <i>Criminal Procedure Law of the People's Republic of China</i>, and <i>Civil Servant Act of the People's Republic of China</i>.</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: NA</b> <b>Justification:</b> Anti-corruption legislation exists.
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.	Y	FMR Chapter 4, 4.1 <i>Legal obligations</i> , 4.1.2.1: <i>The forest management unit has taken effective and tangible measures to protect the forest area from illegal logging, illegal settlement, deforestation and other unauthorized activities.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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 Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.	Y	FMR Chapter 4, 4.2 <i>Forest tenure</i> , 4.2.1.1: <i>The ownership and use right of forest land and forests and trees on the forest land of the forest management unit shall have the certificate issued by the real estate registration authority or other legal certificates, such as contract or lease contract.</i>  FMR Chapter 4, 4.3 <i>Local community and workers' rights</i> , 4.3.4.1: <i>The forest management unit shall recognize the legal right of local community to use and manage the land and resources.</i>  FMR Chapter 4, 4.3 <i>Local community and workers' rights</i> , 4.3.4.3: <i>Under the condition of not impacting on the integrity of the forest ecosystem and the fulfillment of forest management targets, the traditional and authorized right of local residents, especially minority nationalities, shall be guaranteed to enter into or use forest, such as picking non timber forest products, forest recreation, passing, environmental education etc.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR meets the requirements of the PEFC ST 1003:2018.
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	Y	FMR Chapter 4, 4.1 <i>Legal obligations</i> , 4.1.1.1: <i>Forest management units shall take corresponding measures to ensure that applicable national laws and regulations (see</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>rights such as outlined in ILO 169 and the UN Declaration on the Rights of Indigenous Peoples, which shall not be infringed upon without the free, prior and informed consent of the holders of the rights, including the provision of compensation where applicable. Where the extent of rights is not yet resolved, or is in dispute, there are processes for just and fair resolution. In such cases forest managers shall, in the interim, provide meaningful opportunities for parties to be engaged in forest management decisions whilst respecting the processes and roles and responsibilities laid out in the policies and laws where the certification takes place.</p>		<p><i>Appendix A) and international conventions (see Appendix B) are effectively identified, obtained and updated in a timely manner.</i></p> <p><i>FMR Chapter 4, 4.1 Legal obligations, 4.1.1.2: Forest management units shall comply with applicable national laws and regulations and international conventions on forest management.</i></p> <p><i>FMR Chapter 4, 4.3 Local community and workers' rights, 4.3.1.1: Forest management units shall provide employment, training and other social services for residents in and around the forest area (especially for the minor nationalities).</i></p> <p><i>FMR Chapter 4, 4.3 Local community and workers' rights, 4.3.1.2: Forest management units shall provide support for infrastructure construction in forest areas and surrounding areas (especially in the areas of minor nationalities).</i></p> <p><i>FMR Chapter 4, 4.3 Local community and workers' rights, 4.3.4.1: The forest management unit shall recognize the legal right of local community to use and manage the land and resources.</i></p> <p><i>FMR Chapter 4, 4.3 Local community and workers' rights, 4.3.4.3: Under the condition of not impacting on the integrity of the forest ecosystem and the fulfillment of forest management targets, the traditional and authorized right of local residents, especially minority nationalities, shall be guaranteed to enter into or use forest, such as picking non timber forest products, forest recreation, passing, environmental education etc.</i></p> <p><i>FMR Chapter 4, 4.3 Local community and workers' rights, 4.3.5.1: Local residents, especially minority nationalities, shall be consulted with and consensus shall be reached when it is necessary to zone and protect forest land with special cultural, ecological, economic or religious significance to them.</i></p> <p><i>FMR Chapter 4, 4.3 Local community and workers' rights, 4.3.6.1: Appropriate measures shall be taken to avoid the loss of or damage to the legal right, property, resources, or livelihood of local residents, especially minority nationalities.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.6.2: <i>Local residents, especially minority nationalities, shall be consulted with and fairly compensated if the above mentioned damages take place.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.7.1: <i>Traditional knowledge of local residents, especially minority nationalities, shall be respected and rationally used in the forest management.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.7.2: <i>Rights of participation in forest management planning by local residents, especially minority nationalities, shall be appropriately ensured.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.3: <i>A communication and consultation mechanism shall be built with relevant agencies through involvement of local communities, especially minority nationalities.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.3: <i>Opinions of administrators, management units, local communities and other stakeholders are extensively solicited in the process of developing the forest management plan.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p> <p>China is not a signatory to the ILO 169 Convention. Although China voted in favour of the UNDRIP, the Chinese government does not recognize existence of indigenous peoples in China. Instead, 55 minority nationalities are recognized.</p>
6.3.2.3 The standard requires that forest practices and operations shall respect human rights as defined by the Universal Declaration on Human Rights.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.1.1: <i>Forest management units shall provide employment, training and other social services for residents in and around the forest area (especially for the minor nationalities).</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.1: <i>Forest management units shall ensure workers' health and safety.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.4: <i>Operational safety of workers engaging in forest management shall be guaranteed, necessary uniforms and safety</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>facilities shall be provided, and emergency medical treatment and necessary security training shall be provided.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.4.1: <i>The forest management unit shall recognize the legal right of local community to use and manage the land and resources.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.4.3: <i>Under the condition of not impacting on the integrity of the forest ecosystem and the fulfillment of forest management targets, the traditional and authorized right of local residents, especially minority nationalities, shall be guaranteed to enter into or use forest, such as picking non timber forest products, forest recreation, passing, environmental education etc.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.1: <i>Local residents, especially minority nationalities, shall be consulted with and consensus shall be reached when it is necessary to zone and protect forest land with special cultural, ecological, economic or religious significance to them.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.6.1: <i>Appropriate measures shall be taken to avoid the loss of or damage to the legal right, property, resources, or livelihood of local residents, especially minority nationalities.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.6.2: <i>Local residents, especially minority nationalities, shall be consulted with and fairly compensated if the above mentioned damages take place.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.7.2: <i>Rights of participation in forest management planning by local residents, especially minority nationalities, shall be appropriately ensured.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.3: <i>A communication and consultation mechanism shall be built with relevant agencies through involvement of local communities, especially minority nationalities.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.3: <i>Opinions of administrators, management units, local communities and other stakeholders are extensively solicited in the process of developing the forest management plan.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> While the FMR does not explicitly mention the Universal Declaration on Human Rights, it is in line with the PEFC ST 1003:2018 requirement.</p>
6.3.3 Fundamental ILO conventions		
<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>	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.5: <i>Requirements of all ILO conventions to which China is a signatory shall be complied with.</i></p> <p>Addressing ILO conventions to which China is not a signatory:</p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.1: <i>Forest management units shall ensure workers' health and safety.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.2: <i>Pay workers' wages on time and purchase accident insurance for workers.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.3: <i>Legal social welfare shall be provided for workers.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.4: <i>Operational safety of workers engaging in forest management shall be guaranteed, necessary uniforms and safety facilities shall be provided, and emergency medical treatment and necessary security training shall be provided.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.3.1: <i>The forest management unit shall regularly hold workers congress or congress of workers representatives to protect the legitimate rights and interests of employees.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.3.2: <i>Forest workers shall be provided with opportunities to participate in decision-making process of forest operations through various channels.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> China is a signatory to four out of eight fundamental ILO conventions:</p> <ul style="list-style-type: none"> <li>• C100 Equal remuneration</li> <li>• C111 Discrimination (employment and occupation)</li> <li>• C138 Minimum age</li> <li>• C182 Worst form of child labour</li> </ul> <p>The four conventions not signed by China are:</p> <ul style="list-style-type: none"> <li>• C029 Forced Labour</li> <li>• C087 Freedom of Association and Protection of the Right to Organise Convention</li> <li>• C098 Right to Organise and Collective Bargaining Convention</li> <li>• C105 Abolition of Forced Labour</li> </ul> <p>The requirements of the unsigned ILO conventions are considered in FMR standards 4.3.2.1, 4.3.2.2, 4.3.2.3, 4.3.2.4, 4.3.3.1, 4.3.3.2.</p>
6.3.4 Health, safety and working conditions		
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.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.4: <i>Operational safety of workers engaging in forest management shall be guaranteed, necessary uniforms and safety facilities shall be provided, and emergency medical treatment and necessary security training shall be provided.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.4: <i>Operational safety of workers engaging in forest management shall be guaranteed, necessary uniforms and safety</i></p>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>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>		<p><i>facilities shall be provided, and emergency medical treatment and necessary security training shall be provided.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.4.1: <i>The forest management unit establishes a system for providing forest workers with training and guidance.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.4.2: <i>Employees shall be well trained, understand and master the operation requirements, and have the ability to correctly implement forest management operations.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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>	Y	<p>FMR Chapter 4, 4.1 <i>Legal obligations</i>, 4.1.1.2: <i>Forest management units shall comply with applicable national laws and regulations and international conventions on forest management.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The Labor Law of China requires that the wages paid by the employer to the workers shall not be lower than the local minimum wage standard.</p>
<p>6.3.4.4 The standard requires that the organisation is committed to equal opportunities, non-discrimination and freedom from workplace harassment. Gender equality shall be promoted.</p>	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.5: <i>Requirements of all ILO conventions to which China is a signatory shall be complied with.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> China has signed the ILO conventions on:</p> <ul style="list-style-type: none"> <li>• C100 Equal remuneration</li> <li>• C111 Discrimination (employment and occupation)</li> </ul>



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Comment:</b> It is recommended that the requirements to commit to freedom from workplace harassment and to promote gender equality are made explicit in the FMR.
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.	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.2.2: <i>Reasonable investment scale and structure shall be guaranteed for sustainable forest management.</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	FMR Chapter 4, 4.4 <i>Forest management plan</i> , 4.4.4.1: <i>The forest management unit establishes a system for providing forest workers with training and guidance.</i>  FMR Chapter 4, 4.4 <i>Forest management plan</i> , 4.4.4.2: <i>Employees shall be well trained, understand and master the operation requirements, and have the ability to correctly implement forest management operations.</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	FMR Chapter 4, 4.3 <i>Local community and workers' rights</i> , 4.3.3.2: <i>Forest workers shall be provided with opportunities to participate in decision making process of forest operations through various channels.</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.3: <i>A communication and consultation mechanism shall be built with relevant agencies through involvement of local communities, especially minority nationalities.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.4: <i>FMU shall have appropriate mechanisms are in place for resolving complaints and disputes relating to forest management operations, land use rights and work conditions.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
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.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.1: <i>The forest management unit has a timely, effective and scientific forest management plan.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.2: <i>The preparation of forest management plan shall be based on the applicable local, national and international legislation, local land spatial planning, long term forestry planning, the size and use of the forest area and accurate forest resources information.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.4: <i>The contents of the forest management plan should include the following contents:</i></p> <ul style="list-style-type: none"> <li>- <i>Forest management objectives;</i></li> <li>- <i>Forest management organization;</i></li> <li>- <i>Planning and design of forest cultivation and ecological restoration;</i></li> <li>- <i>Planning and design of forest harvesting and regeneration;</i></li> <li>- <i>Production of forest products;</i></li> </ul>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<ul style="list-style-type: none"> <li>- Forest health and forest protection;</li> <li>- Biodiversity conservation;</li> <li>- Infrastructure construction and maintenance;</li> <li>- Investment estimation and benefit analysis;</li> <li>- Necessary charts and maps related to forest management.</li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR requirements for the forest management plan meet the PEFC ST 1003:2018 requirement on inclusion of documented information in the management system.</p>
7.5.2 The standard requires that the documented information is relevant, and updated as appropriate, to the activities of the organisation.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.1: <i>The forest management unit has a timely, effective and scientific forest management plan.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.3.2: <i>The forest management plan shall be periodically revised (less than 10 years) according to forest resources monitoring results, latest science and technology and policy information, including latest market and economic activities related to timber, non timber forest products and forest services, as well as the change of environmental, social and economic circumstances.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
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.	Y	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.2: <i>Measures shall be adopted to maintain and improve the environmental service functions of forests.</i></p> <p>Other standards that address maintaining or increasing forests and their ecosystem services and ecological values of forest resources: 4.5.3.3, 4.5.6.3, 4.5.6.4, 4.5.6.5, 4.5.6.6, 4.5.6.7, 4.5.7.1, 4.5.7.4, 4.5.8.1, 4.5.8.3, 4.5.8.4, 4.5.8.6, 4.6.1.3, 4.6.3.4, 4.7.2.3.</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>Standards that address maintaining or enhancing cultural and social values of forest resources: 4.3.1.1, 4.3.5.1, 4.3.6.1, 4.3.7.1.</p> <p>Standards that address maintaining or enhancing economic values of forest resources: 4.5.2.1, 4.5.3.1, 4.5.7.4.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.1.2 The standard requires that the quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.	Y	<p>FMR Chapter 4, 4.7 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.1: <i>The forest management unit shall develop an annual harvesting amount based on the principle of forest recourse consumption being less than its growth, reasonable management and sustainable use.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.4: <i>Use of timber and non-timber forest products shall not exceed the allowable level for sustainable development.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.9.1: <i>Approaches with the least environmental impacts shall be adopted in forest management operations so as to reduce the damage to the forest resources and the environment, and minimize the risk of degradation of and negative impact to forest ecosystems.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.1: <i>Effective measures shall be taken to minimize the damage to forest lands caused by such human activities as land preparation, afforestation, tending, forest harvesting, regeneration, road construction etc. so as to maintain the natural features of the soil and its long-time productivity in the forest.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.6: <i>FMU shall take positive practices in management operations, such as greenhouse gas emission reductions and efficient use of resources.</i></p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.3: <i>Afforestation of ecologically important non forest ecosystems shall not occur unless in justified circumstances where the conversion:</i>  <i>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</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.3: ...  <i>b) entails a small proportion (no greater than 5 %) of forest type within the certified area; and</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.3: ...  <i>c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
d) does not destroy areas of significantly high carbon stock; and	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.3: ... d) <i>does not destroy areas of significantly high carbon stock; and</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
e) makes a contribution to long-term conservation, economic, and social benefits.	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.3: ... e) <i>makes a contribution to long-term conservation, economic, and social benefits.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
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	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.4: <i>The afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances where the conversion:</i> a) <i>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</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
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	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.4: ... b) <i>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</i>



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
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	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.4: ... <i>c) does not have negative impacts on threatened (including vulnerable, rare or endangered) non forest ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas; and</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.4: ... <i>d) entails a small proportion of the ecologically important non-forest ecosystem managed by an organisation; and</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
e) does not destroy areas of significantly high carbon stock; and	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.4: ... <i>e) does not destroy areas of significantly high carbon stock; and</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
f) makes a contribution to long-term conservation, economic, and social benefits.	Y	FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i> , 4.5.8.4: ... <i>f) makes a contribution to long term conservation, economic, and social benefits.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
8.1.6 The standard requires that if conversion of severely degraded forests to forest plantations is being considered, it must add economic, ecological, social and/or cultural value. Precondition of adding such value are circumstances where the conversion:		
a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: <i>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:</i></p> <p>a) <i>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</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
b) is established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision-making on conversion through transparent and participatory consultation processes; and	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: ...</p> <p>b) <i>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</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
c) has a positive impact on long-term carbon sequestration capacity of forest vegetation; and	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: ...</p> <p>c) <i>has a positive impact on long-term carbon sequestration capacity of forest vegetation; and</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: ...</p> <p><i>d) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: ...</p> <p><i>e) safeguards protective functions of forests for society and other regulating or supporting ecosystem services; and</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: ...</p> <p><i>f) safeguards socio-economic functions of forests, including the recreational function and aesthetic values of forests and other cultural services; and</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: ...</p> <p><i>g) has a land history providing evidence that the degradation is not the consequence of deliberate poor forest management practices; and</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.	y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.5: ...</p> <p><i>h) is based on credible evidence demonstrating that the area is neither recovered nor in the process of recovery.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
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.	y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.5: <i>The afforestation layout and planning is conducive to maintaining and enhancing the value and features of the natural landscape, and its ecological connectivity shall be maintained.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.6: <i>Promoting the conversion of abandoned land and treeless land into forest land shall be taken into consideration.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.1: <i>Effective measures shall be adopted to promote the conservation and regeneration of natural forests.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.9.1: <i>Approaches with the least environmental impacts shall be adopted in forest management operations so as to reduce the damage to the forest resources and the environment, and minimize the risk of degradation of and negative impact to forest ecosystems.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.1.2: <i>According to the results of analysis, forest operational means shall be adjusted or improved by adopting specified ways and means, so as to minimize the impact of forest management performance (including the usage of chemical fertilizers) on the environment and to avoid the degradation of and damages to forest ecosystems.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.2: <i>Measures shall be adopted to maintain and improve the environmental service functions of forests.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.8 <i>Forest protection</i>, 4.8.1.3: <i>Integrated pest management measures shall be employed which focus on silviculture measures and incorporate biological, chemical and physical preventions. The use of chemical pesticides in the forest shall be limited to reduce their impacts on the environment.</i></p> <p>FMR Chapter 4, 4.8 <i>Forest protection</i>, 4.8.1.4: <i>Effective measures shall be employed to protect the various beneficial organisms within the forest and improve the forest's own pest control capacity.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.3: <i>Measures shall be adopted to promote the diversification of the structure of the forest stand and strengthen its stability.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.4.2: <i>Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left as much as possible in quantities and distribution necessary to safeguard biodiversity, taking into account the potential effect on the health and stability of the forest and on surrounding ecosystems.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.8 <i>Forest protection</i>, 4.8.2.7: <i>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 local peoples. In these cases adequate management and control measures shall be taken.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<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.</p>	<p>Y</p>	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.5.1: <i>Tree species for afforestation shall be selected based on the management targets and the principle of proper tree species for proper sites.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.9.1: <i>Approaches with the least environmental impacts shall be adopted in forest management operations so as to reduce the damage to the forest resources and the environment, and minimize the risk of degradation of and negative impact to forest ecosystems.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.1: <i>Effective measures shall be taken to minimize the damage to forest lands caused by such human activities as land preparation, afforestation, tending, forest harvesting, regeneration, road construction etc. so as to maintain the natural features of the soil and its long-time productivity in the forest.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>8.2.5 The standard requires that the indiscriminate disposal of waste on forest land shall be strictly avoided. Non-organic waste and litter shall be collected, stored in designated areas and removed in an environmentally-responsible manner. The spillage of oil or fuel during forest management operations shall be prevented. Emergency procedures for the minimisation of risk of environmental harm arising from the accidental spillage shall be in place.</p>	<p>Y</p>	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.9.1: <i>Approaches with the least environmental impacts shall be adopted in forest management operations so as to reduce the damage to the forest resources and the environment, and minimize the risk of degradation of and negative impact to forest ecosystems.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.3.5: <i>The forest management unit shall develop emergency procedures for transportation, storage, use and accidental leaking of chemicals.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.3: <i>The forest management unit shall ensure the inorganic rubbish and non-recyclable waste to be disposed in a way that will not endanger the environment.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.4: <i>Methods consistent with the requirements for environmental protection shall be adopted to dispose of the wastes and containers of chemicals.</i></p>



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.5: <i>The pollution of water and soil in forest land caused by the leakage of mechanical equipment or oil storage containers shall be avoided.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018. Emergency procedures stipulated by standard 4.7.3.5 have relevance also in the case of accidental spillage of oil or fuel.</p>
8.2.6 The standard requires that integrated pest management, appropriate silviculture alternatives and other biological measures shall be preferred to minimise the use of pesticides.	Y	<p>FMR Chapter 4, 4.8 <i>Forest protection</i>, 4.8.1.3: <i>Integrated pest management measures shall be employed which focus on silviculture measures and incorporate biological, chemical and physical preventions. The use of chemical pesticides in the forest shall be limited to reduce their impacts on the environment.</i></p> <p>FMR Chapter 4, 4.8 <i>Forest protection</i>, 4.8.1.4: <i>Effective measures shall be employed to protect the various beneficial organisms within the forest and improve the forest's own pest control capacity.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.2.7 The standard requires that any use of pesticides is documented.	Y	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.3.4: <i>Records of chemicals use shall be kept.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.2.8 The standard requires that the WHO Class 1A and 1B pesticides and other highly toxic pesticides shall be prohibited, except where no other viable alternative is available. Any exception to the usage of WHO Class 1A and 1B pesticides shall be defined in the national/regional standard.	N	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.3.2: <i>Highly toxic pesticides prohibited by the World Health Organization and relevant national laws and regulations shall not be used.</i></p> <p><b>Conclusion: Minor non-conformity</b></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Justification:</b> There is no reference whether WHO class 1A and 1B pesticides are prohibited by the national laws and regulations. WHO only provides classification of pesticides but has no mandate to prohibit any particular pesticide classes.
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.	Y	FMR Chapter 4, 4.7 <i>Environmental impact</i> , 4.7.3.3: <i>Chlorinated hydrocarbons and other pesticides that remain biologically active and accumulate in the food chain shall be prohibited.</i>  <b>Conclusion: Conformity</b>  <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	FMR Chapter 4, 4.7 <i>Environmental impact</i> , 4.7.3.1: <i>The forest management unit shall show the updated list of all chemicals and relevant documents including name, potent ingredient and application methods.</i>  FMR Chapter 4, 4.7 <i>Environmental impact</i> , 4.7.3.6: <i>Proper equipment and technical training shall be provided to minimize the pollution to the environment and damage to people's health by use of chemicals.</i>  <b>Conclusion: Conformity</b>  <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	FMR Chapter 4, 4.7 <i>Environmental impact</i> , 4.7.1.2: <i>According to the results of analysis, forest operational means shall be adjusted or improved by adopting specified ways and means, so as to minimize the impact of forest management performance (including the usage of chemical fertilizers) on the environment and to avoid the degradation of and damages to forest ecosystems.</i>  FMR Chapter 4, 4.7 <i>Environmental impact</i> , 4.7.2.4: <i>Use organic fertilizer and biological fertilizer to increase soil fertility and reduce the use of chemical fertilizer.</i>



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.1: <i>A diversified economy based on sustainable use of various timber and non-timber forest products, such as forest fruit, oil plants, food, beverages, herbs and materials for chemical industry etc. shall be implemented.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.1: <i>The forest management unit shall develop an annual harvesting amount based on the principle of forest recourse consumption being less than its growth, reasonable management and sustainable use.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.4: <i>Use of timber and non-timber forest products shall not exceed the allowable level for sustainable development.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.3.2 The standard requires that sound economic performance shall be pursued, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.3.2: <i>The forest management plan shall be periodically revised (less than 10 years) according to forest resources monitoring results, latest science and technology and policy information, including latest market and economic activities related to timber, non timber forest products and forest services, as well as the change of environmental, social and economic circumstances.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.2.1: <i>The forest management unit shall take into full consideration economic viability of its management and operational costs.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.1: <i>A diversified economy based on sustainable use of various timber and non-timber forest products, such</i></p>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>as forest fruit, oil plants, food, beverages, herbs and materials for chemical industry etc. shall be implemented.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.3.3 The standard requires that management, harvesting and regeneration operations shall be carried out at a time, and in a way, that does not reduce the productive capacity of the site, for example by avoiding damage to soil and retained stands and trees.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.9.1: <i>Approaches with the least environmental impacts shall be adopted in forest management operations so as to reduce the damage to the forest resources and the environment, and minimize the risk of degradation of and negative impact to forest ecosystems.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.1: <i>Effective measures shall be taken to minimize the damage to forest lands caused by such human activities as land preparation, afforestation, tending, forest harvesting, regeneration, road construction etc. so as to maintain the natural features of the soil and its long time productivity in the forest.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.1: <i>The forest management unit shall develop an annual harvesting amount based on the principle of forest recourse consumption being less than its growth, reasonable management and sustainable use.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.4: <i>Use of timber and non-timber forest products shall not exceed the allowable level for sustainable development.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.9.2: <i>Measures shall be taken to avoid the waste and degradation of the timber grades in the processes for forest harvesting and timber bucking.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>





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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.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.11.1: <i>Adequate infrastructures such as roads, skid tracks, bridges and drainage facilities shall be planned and established, and their effectiveness shall be maintained.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.11.2: <i>The design, establishment and maintenance of such infrastructure shall minimize the negative impact on the environment.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.4: <i>Wildlife corridors shall be established based on the scale of forest management and the wildlife migrating habits.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.7: <i>Afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.8.7: <i>Plantations established within the neighboring area of natural forests for Eco-functions shall be managed to gradually transfer from the landscape and structure of a plantation to that of natural forests and to be conducive to natural forest protection.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.1.2: <i>According to local conditions, certain areas shall be designated as protection areas for rare, threatened and endangered species.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.1.3: <i>Specific protective measures shall be made and implemented when carrying out forest management activities in order to maintain protected areas, protected species and their habitats.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.4.2: <i>Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left as much as possible in</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>quantities and distribution necessary to safeguard biodiversity, taking into account the potential effect on the health and stability of the forest and on surrounding ecosystems.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>8.4.2 The standard requires that inventory, mapping and planning of forest resources shall identify, protect, conserve or set aside ecologically important forest areas.</p> <p>Note: This does not prohibit forest management activities that do not damage the important ecologic values of those biotopes.</p>	Y	<p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.1.1: <i>Rare, threatened and endangered species and their habitats or distribution areas within the area shall be identified and marked on a map.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.1.2: <i>According to local conditions, certain areas shall be designated as protection areas for rare, threatened and endangered species.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.1.3: <i>Specific protective measures shall be made and implemented when carrying out forest management activities in order to maintain protected areas, protected species and their habitats.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.3.1: <i>Typical, rare, fragile forest ecosystems shall be identified through inventory within the forest management unit.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.3.3: <i>Measures for typical, rare, fragile forest ecosystem protection shall be developed.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.3.4: <i>Protective measures shall be implemented to maintain the natural status of the typical, rare, fragile forest ecosystems.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>8.4.3 The standard requires that protected, threatened and endangered plant and animal species shall not be exploited for commercial purposes. Where necessary, measures shall be taken for their protection and, where relevant, to increase their population.</p>	Y	<p>FMR Chapter 4, 4.1 <i>Legal obligations</i>, 4.1.1.2: <i>Forest management units shall comply with applicable national laws and regulations and international conventions on forest management.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>Note: The requirement does not preclude trade according to CITES requirements.</p>		<p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.1.2: <i>According to local conditions, certain areas shall be designated as protection areas for rare, threatened and endangered species.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.1.3: <i>Specific protective measures shall be made and implemented when carrying out forest management activities in order to maintain protected areas, protected species and their habitats.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> China's legislation (Law on the Protection of Wildlife) prohibits the sale, purchase and use of wildlife under state-level protection.</p>
<p>8.4.4 The standard requires that successful regeneration shall be ensured through natural regeneration or planting that is adequate to ensure the quantity and quality of the forest resources.</p>	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.2.1: <i>The forest management unit shall take into full consideration economic viability of its management and operational costs.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.1: <i>The forest management unit shall develop an annual harvesting amount based on the principle of forest recourse consumption being less than its growth, reasonable management and sustainable use.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR does not place explicit requirements for forest regeneration. However, the FMR requirements for economic viability and sustainable use of resources practically necessitates that successful forest regeneration is ensured within forest management units.</p>
<p>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</p>	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.5.1: <i>Tree species for afforestation shall be selected based on the management targets and the principle of proper tree species for proper sites.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.5.2: <i>Indigenous tree species shall be selected with priority, while afforestation of pure forests shall be minimized.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>evaluated, and if negative impacts can be avoided or minimised.</p> <p>Note: CBD (Convention on Biological Diversity) Guiding Principles for the Prevention, Introduction, and Mitigation of Impacts of Alien Species that Threaten Ecosystems, Habitats or Species are recognised as guidance for avoidance of invasive species.</p>		<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.5.3: <i>Introduction of exotic species when appropriate is limited to those that are not invasive, do not affect the growth of local plants, and can provide environmental and economic benefits.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.5.4: <i>Monitoring shall be carefully made on the growth status and ecological implication after exotic tree species are used for afforestation.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.3: <i>Measures shall be adopted to promote the diversification of the structure of the forest stand and strengthen its stability.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.4.1: <i>Exotic species can only be introduced with the precondition that they have passed strict quarantine and ecological environment assessment and are guaranteed to do no harm to the environment and biodiversity.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.4.2: <i>Records shall be kept on the use of exotic species and their ecological impacts shall be monitored.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>8.4.6 The standard requires that afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</p>	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.7: <i>Afforestation, reforestation and other tree planting activities that contribute to the improvement and restoration of ecological connectivity shall be promoted.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</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</p>	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.5.5: <i>No GMO trees are allowed.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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.		
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.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.3: <i>Measures shall be adopted to promote the diversification of the structure of the forest stand and strengthen its stability.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.5: <i>The afforestation layout and planning is conducive to maintaining and enhancing the value and features of the natural landscape, and its ecological connectivity shall be maintained.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.4.9 The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.3: <i>Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported when economically feasible.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.4.2: <i>Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left as much as possible in quantities and distribution necessary to safeguard biodiversity, taking into account the potential effect on the health and stability of the forest and on surrounding ecosystems.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.4.3: <i>Degraded forests ecosystems shall be restored through management approach.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.1.2: <i>According to the results of analysis, forest operational means shall be adjusted or improved by adopting specified ways and</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>means, so as to minimize the impact of forest management performance (including the usage of chemical fertilizers) on the environment and to avoid the degradation of and damages to forest ecosystems.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.1: <i>Effective measures shall be taken to minimize the damage to forest lands caused by such human activities as land preparation, afforestation, tending, forest harvesting, regeneration, road construction etc. so as to maintain the natural features of the soil and its long-time productivity in the forest.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.6.4: <i>Wildlife corridors shall be established based on the scale of forest management and the wildlife migrating habits.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.11.1: <i>Adequate infrastructures such as roads, skid tracks, bridges and drainage facilities shall be planned and established, and their effectiveness shall be maintained.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.11.2: <i>The design, establishment and maintenance of such infrastructure shall minimize the negative impact on the environment.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.6.1: <i>The forest management unit shall adopt measures minimizing the impacts of animal populations on forest regeneration, growth and biodiversity.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>



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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.	Y	<p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.4.2: <i>Standing and fallen dead wood, hollow trees, old groves and special rare tree species shall be left as much as possible in quantities and distribution necessary to safeguard biodiversity, taking into account the potential effect on the health and stability of the forest and on surrounding ecosystems.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
8.5 Criterion 5: Maintenance or appropriate enhancement of protective functions in forest management (notably soil and water)		
8.5.1 The standard requires that protective functions of forests for society, such as their potential role in erosion control, flood prevention, water purification, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.	Y	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.1: <i>The forest management unit shall understand and identify the environmental service functions of forests.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.2: <i>Measures shall be adopted to maintain and improve the environmental service functions of forests.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>
8.5.2 The standard requires that areas that fulfil specific and recognised protective functions for society shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.1: <i>Local residents, especially minority nationalities, shall be consulted with and consensus shall be reached when it is necessary to zone and protect forest land with special cultural, ecological, economic or religious significance to them.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.3: <i>Adequate buffer zones shall be established to conserve water and soil at the banks of rivers and streams or around water bodies, and these buffer zones shall be marked in the forest map or the forest operational design.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.1: <i>The forest management unit shall understand and identify the environmental service functions of forests.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.5.2: <i>Measures shall be adopted to maintain and improve the environmental service functions of forests.</i></p>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
8.5.3 The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.	Y	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.1: <i>Effective measures shall be taken to minimize the damage to forest lands caused by such human activities as land preparation, afforestation, tending, forest harvesting, regeneration, road construction etc. so as to maintain the natural features of the soil and its long-time productivity in the forest.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.2: <i>Negative impacts on the quality and quantity of water resources shall be reduced, soil and water erosion shall be controlled, and severe damage to catchments within the forest shall be avoided.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.3: <i>Adequate buffer zones shall be established to conserve water and soil at the banks of rivers and streams or around water bodies, and these buffer zones shall be marked in the forest map or the forest operational design.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.6.1: <i>The forest management unit shall adopt measures minimizing the impacts of animal populations on forest regeneration, growth and biodiversity.</i></p> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.2: <i>Negative impacts on the quality and quantity of water resources shall be reduced, soil and water erosion shall be controlled, and severe damage to catchments within the forest shall be avoided.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.3: <i>Adequate buffer zones shall be established to conserve water and soil at the banks of rivers and streams or around water bodies, and these buffer zones shall be marked in the forest map or the forest operational design.</i></p>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.3.6: <i>Proper equipment and technical training shall be provided to minimize the pollution to the environment and damage to people's health by use of chemicals.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>8.5.5 The standard requires that construction of roads, bridges and other infrastructure shall be carried out in a manner that minimises bare soil exposure, avoids the introduction of soil into watercourses and preserves the natural level and function of water courses and river beds. Proper road drainage facilities shall be installed and maintained.</p>	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.11.1: <i>Adequate infrastructures such as roads, skid tracks, bridges and drainage facilities shall be planned and established, and their effectiveness shall be maintained.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.11.2: <i>The design, establishment and maintenance of such infrastructure shall minimize the negative impact on the environment.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.2: <i>Negative impacts on the quality and quantity of water resources shall be reduced, soil and water erosion shall be controlled, and severe damage to catchments within the forest shall be avoided.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.2.3: <i>Adequate buffer zones shall be established to conserve water and soil at the banks of rivers and streams or around water bodies, and these buffer zones shall be marked in the forest map or the forest operational design.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.6 Criterion 6: Maintenance or appropriate enhancement of socio-economic functions and conditions		
<p>8.6.1 The standard requires that forest management planning shall aim to respect all socio-economic functions of forests.</p>	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.1.1: <i>Forest management units shall provide employment, training and other social services for residents in and around the forest area (especially for the minor nationalities).</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.3: <i>Opinions of administrators, management units, local communities and other stakeholders are extensively solicited in the process of developing the forest management plan.</i></p> <p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.1.6: <i>The forest management plan shall take into account the different uses or functions of the managed forest area.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.1: <i>A diversified economy based on sustainable use of various timber and non-timber forest products, such as forest fruit, oil plants, food, beverages, herbs and materials for chemical industry etc. shall be implemented.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>8.6.2 The standard requires that adequate public access to forests for the purpose of recreation shall be provided, taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, as well as compatibility with other functions of the forest.</p>	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.4.1: <i>The forest management unit shall recognize the legal right of local community to use and manage the land and resources.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.4.3: <i>Under the condition of not impacting on the integrity of the forest ecosystem and the fulfillment of forest management targets, the traditional and authorized right of local residents, especially minority nationalities, shall be guaranteed to enter into or use forest, such as picking non timber forest products, forest recreation, passing, environmental education etc.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.4.4: <i>Regulations shall be clearly defined and informed to local residents, if there are forests that can only be entered into or used in certain circumstances or at a certain time.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.1: <i>Local residents, especially minority nationalities, shall be consulted with and consensus shall be reached when it is necessary to zone and protect forest land with special cultural, ecological, economic or religious significance to them.</i></p> <p><b>Conclusion: Conformity</b></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.1: <i>Local residents, especially minority nationalities, shall be consulted with and consensus shall be reached when it is necessary to zone and protect forest land with special cultural, ecological, economic or religious significance to them.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.2: <i>Appropriate measures shall be taken to protect the zoned and protected forest land.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.6.4 The standard requires that management shall promote the long-term health and well-being of communities within or adjacent to the forest management area, where appropriate supported by engagement with local communities and indigenous peoples.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.1: <i>Local residents, especially minority nationalities, shall be consulted with and consensus shall be reached when it is necessary to zone and protect forest land with special cultural, ecological, economic or religious significance to them.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.5.2: <i>Appropriate measures shall be taken to protect the zoned and protected forest land.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.1: <i>Social impact of forest management shall be assessed according to its means and scale.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.2: <i>Results of the social impact assessment shall be considered in the forest management plan and operation plan.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.3: <i>A communication and consultation mechanism shall be built with relevant agencies through involvement of local communities, especially minority nationalities.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.7.1: <i>Traditional knowledge of local residents, especially minority nationalities, shall be respected and rationally used in the forest management.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.7.3: <i>Shall equitably share the benefits arising from the utilization of such traditional knowledge.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.3: <i>Traditional management systems that have created valuable ecosystems, such as coppice, on appropriate sites shall be supported when economically feasible.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
8.6.6 The standard requires that management shall give due regard to the role of forestry in local economies. Special consideration shall be given to new opportunities for training and employment of local people, including indigenous peoples.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.1.1: <i>Forest management units shall provide employment, training and other social services for residents in and around the forest area (especially for the minor nationalities).</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</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.	Y	<p>FMR Chapter 4, 4.4 <i>Forest management plan</i>, 4.4.2.3: <i>The forest management shall contribute to research activities needed for sustainable forest management or support relevant research activities carried out by other organizations.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
9. Performance evaluation		
9.1 Monitoring, measurement, analysis and evaluation		



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>9.1.1 The standard requires that monitoring of forest resources and evaluation of their management, including ecological, social and economic effects, shall be periodically performed, and results fed back into the planning process.</p>	<p>Y</p>	<p>FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i>, 4.9.1.1: <i>The contents and indicators of forest monitoring should be determined according to the scale and intensity of forest management activities, and an appropriate monitoring strategy shall be established.</i></p> <p>FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i>, 4.9.1.2: <i>All monitoring activities shall be carried out continuously or regularly in accordance with the monitoring strategy, and the monitoring records shall be kept.</i></p> <p>FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i>, 4.9.1.3: <i>Forest monitoring results shall be reflected in developing or revising the forest management plan and operation plan.</i></p> <p>Standards specifically addressing evaluation of ecological effects of forest management:</p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.5.4: <i>Monitoring shall be carefully made on the growth status and ecological implication after exotic tree species are used for afforestation.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.1.1: <i>The forest management unit shall analyze the potential impact of forest management activities on the environment based on the scale and intensity of its forest management and forest resource features.</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.1.2: <i>According to the results of analysis, forest operational means shall be adjusted or improved by adopting specified ways and means...</i></p> <p>FMR Chapter 4, 4.7 <i>Environmental impact</i>, 4.7.4.2: <i>Records shall be kept on the use of exotic species and their ecological impacts shall be monitored.</i></p> <p>Standards specifically addressing evaluation of social effects of forest management:</p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.1: <i>Social impact of forest management shall be assessed according to its means and scale.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.8.2: <i>Results of the social impact assessment shall be considered in the forest management plan and operation plan.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>In addition, FMR standard 4.9.2.1 details monitoring indicators, which include ecological, social and economic factors.</p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>9.1.2 The standard requires that health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.</p>	Y	<p>FMR Chapter 4, 4.9 <i>Forest monitoring and documentation</i>, 4.9.2.1: <i>Forest monitoring should include: ...</i></p> <ul style="list-style-type: none"> <li>• <i>Structure, growth, regeneration and health condition of the forest; ...</i></li> <li>• <i>Dynamics and trends of disease, pest and forest fires; ...</i></li> <li>• <i>Environmental and social impacts of forest harvesting and other management activities; ...</i></li> <li>• <i>Impact of climatic factors and air pollution on forest growth;</i></li> <li>• <i>Human activities such as overgrazing or overstocking; ...</i></li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>9.1.3 The standard requires that where it is the responsibility of the forest owner/manager and included in forest management, the use of non-wood forest products, including hunting and fishing, shall be regulated, monitored and controlled.</p>	Y	<p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.1: <i>A diversified economy based on sustainable use of various timber and non-timber forest products, such as forest fruit, oil plants, food, beverages, herbs and materials for chemical industry etc. shall be implemented.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.3.2: <i>Measures for breeding, protection and use of main non timber forest products shall be formulated.</i></p> <p>FMR Chapter 4, 4.5 <i>Cultivation and utilization of forest resources</i>, 4.5.7.4: <i>Use of timber and non-timber forest products shall not exceed the allowable level for sustainable development.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.2.1: <i>Hunting, trapping and collecting activities of forest management units shall apply for hunting license or collecting license according to law.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.2.2: <i>Hunting, trapping and collecting activities shall follow the national quota regulations for hunting and collecting allocations.</i></p> <p>FMR Chapter 4, 4.6 <i>Biodiversity conservation</i>, 4.6.2.3: <i>The forest management unit shall clean up the illegally laid hunting traps and tools in time.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
9.1.4 The standard requires that working conditions shall be regularly monitored and adapted as necessary.	Y	<p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.1: <i>Forest management units shall ensure workers' health and safety.</i></p> <p>FMR Chapter 4, 4.3 <i>Local community and workers' rights</i>, 4.3.2.4: <i>Operational safety of workers engaging in forest management shall be guaranteed, necessary uniforms and safety facilities shall be provided, and emergency medical treatment and necessary security training shall be provided.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p> <p><b>Comment:</b> It is recommended that the requirement for regular monitoring of working conditions is made explicit in the FMR.</p>
9.2 Internal audit		
9.2.1 Objectives		
The standard requires that an internal audit programme at planned intervals shall provide information on whether the management system		
a) conforms to • the organisation's requirements for its management system;	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.1.2: <i>The internal audit shall provide information on whether the management system:</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
• the requirements of the national sustainable forest management standard		<i>a) conforms to the organisation's requirements for its management system and the requirements of the standard; ...</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
b) is effectively implemented and maintained.	Y	<i>FMR Chapter 4, 4.10 Improvement, 4.10.1.2: The internal audit shall provide information on whether the management system: ...</i> <i>b) is effectively implemented and maintained.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
<b>9.2.2 Organisation</b> The standard requires that the organisation shall:		
a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits;	Y	<i>FMR Chapter 4, 4.11 Organisation, 4.11.1: The organisation shall plan, establish, implement and maintain an audit programme 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.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
b) define the audit criteria and scope for each audit;	Y	<i>FMR Chapter 4, 4.11 Organisation, 4.11.2: Define the audit criteria and scope for each audit.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
c) select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process;	Y	<i>FMR Chapter 4, 4.11 Organisation, 4.11.3: Select the auditors and conduct audits to ensure objectivity and the impartiality of the audit process.</i>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
d) ensure that the results of the audits are reported to relevant management;	Y	FMR Chapter 4, 4.11 <i>Organisation</i> , 4.11.4: <i>Ensure that the results of the audits are reported to relevant management.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
e) retain documented information as evidence of the implementation of the audit programme and the audit results.	Y	FMR Chapter 4, 4.11 <i>Organisation</i> , 4.11.5: <i>Retain documented information as evidence of the implementation of the audit programme and the audit results.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.
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;	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.2.1: <i>Management review activities shall be implemented at least once a year.</i> FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.2.2: <i>The contents of management review shall include:</i> <i>a) the rectification of the last management review; ...</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
b) changes in external and internal issues that are relevant to the management system;	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.2.2: <i>The contents of management review shall include: ...</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>i) <i>External or internal changes related to the management system; ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
<p>c) information on the organisation's performance, including trends in:</p> <ul style="list-style-type: none"> <li>• nonconformities and corrective actions;</li> <li>• monitoring and measurement results;</li> <li>• audit results;</li> </ul>	Y	<p>FMR Chapter 4, 4.10 <i>Improvement</i>, 4.10.2.2: <i>The contents of management review shall include: ...</i></p> <p>j) <i>Information on the management status of forest management units, including:</i></p> <ul style="list-style-type: none"> <li>• <i>Nonconformities and rectification measures;</i></li> <li>• <i>Monitoring results;</i></li> <li>• <i>Internal audit results; ...</i></li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
d) opportunities for continual improvement	Y	<p>FMR Chapter 4, 4.10 <i>Improvement</i>, 4.10.2.2: <i>The contents of management review shall include: ...</i></p> <p>c) <i>Information on the management status of forest management units, including:</i></p> <ul style="list-style-type: none"> <li>• <i>Opportunities for continuous improvement.</i></li> </ul> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
9.3.2 The standard requires that the outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.	Y	<p>FMR Chapter 4, 4.10 <i>Improvement</i>, 4.10.2.3: <i>The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the management system.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is congruent with the PEFC ST 1003:2018.</p>

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
9.3.3 The standard requires that documented information as evidence of the results of management reviews shall be retained.	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.2.5: <i>The management review records of forest management units shall be kept for at least 5 years.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
10. Improvement		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires that when a nonconformity occurs, the organisation shall:		
a) react to the nonconformity and, as applicable: i. take action to control and correct it; ii. deal with the consequences;	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.3.1: <i>In case of any nonconformity, the forest management unit shall:</i>  a) <i>Take measures to control and correct the nonconformity, and deal with any negative effects; ...</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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;	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.3.1: <i>In case of any nonconformity, the forest management unit shall: ...</i>  b) <i>Check the nonconformity, figure out the causes, and examine for any other nonconformity or potential risk leading to nonconformity; ...</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
c) implement any action needed;	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.3.1: <i>In case of any nonconformity, the forest management unit shall:</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>a) <i>Take measures to control and correct the nonconformity, and deal with any negative effects; ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
d) review the effectiveness of any corrective action taken;	Y	<p>FMR Chapter 4, 4.10 <i>Improvement</i>, 4.10.3.1: <i>In case of any nonconformity, the forest management unit shall: ...</i></p> <p>c) <i>Assess the effectiveness of all corrective measures; ...</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
e) make changes to the management system, if necessary.	Y	<p>FMR Chapter 4, 4.10 <i>Improvement</i>, 4.10.3.1: <i>In case of any nonconformity, the forest management unit shall: ...</i></p> <p>d) <i>Adjust the management system when necessary.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
10.1.2 The standard requires that corrective actions shall be appropriate to the effects of the nonconformities encountered.	Y	<p>FMR Chapter 4, 4.10 <i>Improvement</i>, 4.10.3.2: <i>Corrective measures shall effectively address the nonconformity.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.</p>
10.1.3 The standard requires that the organisation shall retain documented information as evidence of:		
a) the nature of the nonconformities and any subsequent actions taken;	Y	<p>FMR Chapter 4, 4.10 <i>Improvement</i>, 4.10.3.3: <i>Documents and records shall be kept, including the type of nonconformity, corrective measures and results of correction.</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
b) the results of any corrective action.	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.3.3: <i>Documents and records shall be kept, including the type of nonconformity, corrective measures and results of correction.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.
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.	Y	FMR Chapter 4, 4.10 <i>Improvement</i> , 4.10.3.4: <i>Continuously improve the sustainable forest management system to ensure its suitability, completeness and practicality.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The FMR is in line with the PEFC ST 1003:2018.

## PEFC Checklist (4) - Group Forest Management Certification (PEFC ST 1002:2018)

### 1 Scope

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

Any inconsistencies between this text and the original referred to document will be overruled by the content and wording of the technical document.

### 2 Checklist

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>4. Context of the group organisation</b>		
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 b) other groups and/or c) whether there are any other specific circumstances which influence the implementation of the group management system.	Y	<p>The CFCC Group Forest Management Requirements (hereafter CFCS GM):</p> <p><i>4.1 Understanding the group organization and its context</i></p> <p><i>A general framework for the group organisation shall be determined by the group entity in accordance with the following:</i></p> <p><i>a) regional groups: group of forest owners/managers defined by regional borders and</i></p> <p><i>b) other groups; and/or</i></p> <p><i>c) whether there are any other specific circumstances which influence the implementation of the group management system.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to those defined in PEFC ST 1002:2018.</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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 b) the relevant expectations of these affected stakeholders.	Y	CFCS GM: <i>4.2 Understanding the needs and expectations of affected stakeholders The group organisation shall identify:</i> <i>a) the affected stakeholders that are relevant for the group management system</i> <i>b) the relevant expectations of these affected stakeholders. Understanding the needs and expectations of interested parties.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to the PEFC ST 1002:2018.
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), b) the certified area, c) the group certificate and d) the document confirming participation in group certification.	Y	CFCS GM: <i>4.3.1 The group management shall provide definitions relating to the following terms, which are in conformity with the definitions of those terms presented in chapter 3:</i> <i>a) the group organisation and the elements of the group organisation (group entity and participant),</i> <i>b) the certified area,</i> <i>c) the group certificate and</i> <i>d) the document confirming participation in group certification.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018.
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.	Y	CFCS GM: <i>4.3.2 The boundaries and applicability of the group management system shall be determined to establish the scope of the group management system and define which requirements of the CFCC Forest Management Standard that may be fulfilled on the group level.</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to the PEFC ST 1002:2018.
4.3.3 The standard shall define which requirements of the sustainable forest management standard may be fulfilled on group level.	Y	CFCS GM: <i>4.3.2 The boundaries and applicability of the group management system shall be determined to establish the scope of the group management system and define which requirements of the CFCC Forest Management Standard that may be fulfilled on the group level.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to the PEFC ST 1002:2018.
4.3.4 The standard requires that the scope shall be made available as documented information.	Y	CFCS GM: <i>4.3.3 The scope shall be made available as documented information.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018.
<b>4.4 Group management system</b>		
4.4.1 The standard requires that all participants shall be subject to the internal monitoring and the internal audit programme.	Y	CFCS GM: <i>4.4.1 All participants shall be subject to the internal monitoring and the internal audit programme</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
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.	Y	CFCS GM: <i>4.4.2 A certified CFCC/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.</i> <b>Conclusion: Conformity</b> <b>Justification:</b>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The definitions are identical to those defined in PEFC ST 1002:2018
<b>5. Leadership</b>		
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:		
<p>a) to implement and maintain an effective management system covering all participants of the group;</p> <p>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;</p> <p>c) to establish written procedures for the management of the group organisation;</p> <p>d) to establish written procedures for the acceptance of new participants of the group organisation. These acceptance procedures shall cover at least the verification of the applicant's information about contact details, clear identification of their forest property and its/their size(s)</p> <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</p> <p>f) to keep documented information of:</p> <p>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,</p> <p>ii. all participants, including their contact details, identification of their forest property and its/their size(s),</p>	Y	<p>CFCS GM:</p> <p><i>5.1.1 Functions and responsibilities of the group entity</i></p> <p><i>a) to implement and maintain an effective management system covering all participants of the group;</i></p> <p><i>b) to represent the group organisation in the certification process, including in communications and relationship with the certification body, submission of an application for certification, and contractual relationship with the certification body;</i></p> <p><i>c) to establish written procedures for the management of the group organisation;</i></p> <p><i>d) to establish written procedures for the acceptance of new participants of the group organisation. These acceptance procedures shall cover at least the verification of the applicant's information about contact details, clear identification of their forest property and its/their size(s);</i></p> <p><i>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;</i></p> <p><i>f) to keep documented information of:</i></p> <p><i>i. the group entity and participants' conformity with the requirements of the CFCC Forest Management Standard, and other applicable requirements of the CFCC,</i></p> <p><i>ii. all participants, including their contact details, identification of their forest property and its/their size(s),</i></p> <p><i>iii. the certified area, and</i></p> <p><i>iv. the implementation of an internal monitoring programme, its review and any preventative and/or corrective actions taken;</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
iii. the certified area, iv. the implementation of an internal monitoring programme, its review and any preventive and/or corrective actions taken;		The definitions are identical to those defined in PEFC ST 1002:2018
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;  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.	Y	CFCS GM: <i>g) to establish connections with all participants based on a binding written agreement which shall include the participants' commitment to comply with the CFCC 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 CFCC Forest Management Standard;</i>  <i>Note: The requirements for "participant's 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, sustainable forest management 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 condition of the contract are enforceable.</i>  <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
h) to provide all participants with a document confirming		CFCS GM:



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>participation in the group forest certification;</p> <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;</p> <p>j) to address nonconformities reported from group members which were identified under other PEFC certifications than the particular group certification and to ensure implementation with all group members;</p> <p>k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with the certification requirements;</p> <p>l) to operate an annual internal audit programme covering both group members and group entity;</p> <p>m) to operate a management review of the group forest certification and acting on the results from the review;</p>	Y	<p><i>h) to provide all participants with a document confirming participation in the group forest certification;</i></p> <p><i>i) to provide all participants with information and guidance required for the effective implementation and maintenance of the CFCC Forest Management Standard and other applicable requirements of the CFCC;</i></p> <p><i>j) to address nonconformities reported from group members which were identified under other CFCC/PEFC certifications than the particular group certification and to ensure implementation with all group members;</i></p> <p><i>k) to operate an internal monitoring programme that provides for the evaluation of the participants' conformity with certification requirements;</i></p> <p><i>l) to operate an annual internal audit programme covering both group members and group entity;</i></p> <p><i>m) to operate a management review of the group forest certification and acting on the results from the review;</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to those defined in PEFC ST 1002:2018</p>
<p>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.</p>	Y	<p>CFCS GM:</p> <p><i>n) to provide full co-operation and assistance in responding effectively to all requests from the certification body, accreditation body, CFCC and PEFC international 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.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to those defined in PEFC ST 1002:2018</p>
<p>5.1.2 Function and responsibilities of participants</p> <p>The standard requires that the following functions and responsibilities of the participants shall be specified:</p>		
<p>a) To provide the group entity with a binding written agreement, including a commitment on conformity with the</p>	Y	<p>CFCS GM:</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>sustainable forest management standard and other applicable requirements of the forest certification system; group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion.</p> <p>Note: The requirement for “written agreement” and participants’ “commitment” is also satisfied by the commitment of and written agreement of a pre-existing organisation or group or the members participation, such as a forest owners’/managers’ association, SFM programme and submission to tax programming, where the organisation can demonstrate that it has a legal mandate to represent the participants and where its commitment and the terms and conditions of the contract are enforceable.</p>		<p><i>5.1.2 Function and responsibilities of participants All participants are required to perform the following functions and responsibilities:</i></p> <p><i>a) to provide the group entity with a binding written agreement, including a commitment on conformity with the CFCC Forest Management Standard and other applicable requirements of the CFCC; group participants excluded from any certification group cannot apply for group membership within 12 months after exclusion;</i></p> <p><i>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 condition of the contract are enforceable.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to those defined in PEFC ST 1002:2018</p>
<p>b) To provide the group entity with information about previous group participation.</p> <p>c) to comply with the sustainable forest management standard and other applicable requirements of the certification system as well as with the requirements of the management system;</p>	Y	<p>CFCS GM:</p> <p><i>5.1.2 b) to provide the group entity with information about previous group participation;</i></p> <p><i>5.1.2 c) to comply with the CFCC Forest Management Standard and other applicable requirements of the CFCC as well as with the requirements of the management system;</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to those defined in PEFC ST 1002:2018</p>
<p>d) to provide full co-operation and assistance in responding effectively to all requests from the group entity, or certification body for relevant data, documentation or other information; allowing access to the forest and other facilities, whether in connection with formal audits or reviews or otherwise related or with implications for the management system;</p> <p>e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group</p>	Y	<p>CFCS GM:</p> <p><i>5.1.2 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;</i></p> <p><i>5.1.2 e) to inform the group entity about nonconformities identified under other PEFC certifications than the particular group certification;</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
certification. f) to implement relevant corrective and preventive actions established by the group entity.		<i>5.1.2 f) to implement relevant corrective and preventive actions established by the group entity.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
<b>5.2 Commitment and policy</b>		
<b>5.2.1 The standard requires that the group entity shall provide a commitment:</b>		
a) to comply with the sustainable forest management standard and other applicable requirements of the certification system; b) to integrate the group certification requirements in the group management system; c) to continuously improve the group management system; d) to continuously support the improvement of the sustainable management of the land/forests by the participants.	Y	CFCS GM: <i>5.2.1 The group entity shall provide a commitment: a) to comply with the CFCC Forest Management Standard and other applicable requirements of the CFCC; b) to integrate the group certification requirements in the group management system; c) to continuously improve the group management system; d) to continuously support the improvement of the sustainable management of the land/forests by the participants.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
<b>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.</b>	Y	CFCS GM: <i>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.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
<b>5.2.3 The standard requires that the participants shall provide a commitment</b>		
a) to follow the rules of the management system; b) to implement the requirements of the sustainability standard in their operations in their area.	Y	CFCS GM: <i>5.2.3 The participants shall provide a commitment a) to follow the rules of the management system;</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<i>b) to implement the CFCC Forest Management Standard in their operations in their area.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
<b>6. Planning</b>		
6.1 The standard requires that if a group organisation plans any changes in the group management system, these changes shall be included in a group management plan.	Y	CFCS GM: <i>6.1 If a group organisation plans any changes in the group management system, these changes shall be included in a group management plan.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
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.	Y	CFCS GM: <i>6.2 If a group organisation decides to fulfil requirements of the CFCC Forest Management Standard on the group level, these requirements shall be considered in a group management plan.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
<b>7. Support</b>		
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.	Y	CFCS GM: <i>7.1 To ensure sustainability of the group organisation, resources needed for the establishment, implementation, maintenance and continual improvement of the group management system shall be determined and provided.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
7.2 The standard shall define the necessary competence of persons doing work in the group management system.	Y	CFCS GM: <i>7.2 The persons doing work in the group management system shall have the necessary</i>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<i>competence relevant to their roles.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
7.3 The standard requires that communication processes shall be in place to raise the awareness of participants concerning: a) the group management policy; b) the requirements of the sustainable forest management standard; c) their contribution to the effectiveness of the group management system and the sustainable forest management, including the benefits of improved group performance; d) the implications of not conforming with the group management system requirements.	Y	CFCS GM: <i>7.3 Communication processes shall be in place to raise the awareness of participants concerning:</i> <i>a) the group management policy;</i> <i>b) the requirements of the CFCC Forest Management Standard;</i> <i>c) their contribution to the effectiveness of the group management system and sustainable forest management, including the benefits of improved group performance;</i> <i>d) the implications of not conforming with the group management system requirements.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
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; b) when to communicate; c) with whom to communicate; d) how to communicate.	Y	CFCS GM: <i>7.4 The internal and external communications relevant to the group management system shall be determined. This includes:</i> <i>a) on what to communicate;</i> <i>b) when to communicate;</i> <i>c) with whom to communicate;</i> <i>d) how to communicate.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
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	Y	CFCS GM: <i>7.5 The appropriate mechanisms shall be in place for resolving complaints and disputes</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
operations.		<i>relating to group management and sustainable forest management operations.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to those defined in PEFC ST 1002:2018
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; b) available and suitable for use, where and when it is needed; c) adequately protected against loss of confidentiality, improper use, or loss of integrity.	Y	CFCS GM: <i>7.6 The documented information relevant to the group management system and the conformance with the requirements of the CFCC Forest Management Standard shall be:</i> <i>a) up to date;</i> <i>b) available and suitable for use, where and when it is needed;</i> <i>c) adequately protected against loss of confidentiality, improper use, or loss of integrity.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
<b>8. Operation</b>		
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 b) to implement the actions determined in 6.	Y	CFCS GM: <i>8.1 Group organisation shall plan, implement and control processes needed:</i> <i>a) to meet the requirements of the group certification standard and the CFCC Forest Management Standard and</i> <i>b) to implement the actions determined in chapter 6.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
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;	Y	CFCS GM:





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
b) implementing control of the processes in accordance with the criteria; c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.		<i>8.2 This planning, implementing and controlling shall be done by:</i> <i>a) defining the necessary processes and establishing criteria for those;</i> <i>b) implementing control of the processes in accordance with the criteria;</i> <i>c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
<b>9. Performance evaluation</b>		
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; b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results; c) when the monitoring and measuring shall be performed; d) when the results from monitoring and measurement shall be analysed and evaluated; e) what documented information shall be available as evidence of the results.	Y	CFCS GM: <i>9.1.1 An ongoing internal monitoring programme provides confidence in the conformity of the group organisation with the CFCC Forest Management Standard. In particular, it shall be determined:</i> <i>a) what shall be monitored and measured;</i> <i>b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;</i> <i>c) when the monitoring and measuring shall be performed;</i> <i>d) when the results from monitoring and measurement shall be analysed and evaluated;</i> <i>e) what documented information shall be available as evidence of the results.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
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	Y	CFCS GM: <i>9.1.2 Group entity shall evaluate the group management performance and the effectiveness of the group management system concerning the implementation of the</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
the implementation of the sustainable forest management requirements.		<p><i>CFCC Forest Management Standard requirements.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are equivalent to those defined in PEFC ST 1002:2018</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:		
<p>a) conforms to</p> <p>i. the group organisation's own requirements for its group management system;</p> <p>ii. the requirements of the national group certification standard;</p> <p>b) ensures the implementation of the sustainable forest management standard on the participant level;</p> <p>c) is effectively implemented and maintained.</p>	Y	<p>CFCS GM:</p> <p><i>9.2.1.1 An annual internal audit programme shall provide information on whether the group management system:</i></p> <p><i>a) conforms to</i></p> <p><i>i. the group organisation's own requirements for its group management system; ii. the requirements of the national group certification standard;</i></p> <p><i>b) ensures the implementation of the CFCC Forest Management Standard on the participant level;</i></p> <p><i>c) is effectively implemented and maintained.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are equivalent to those defined in PEFC ST 1002:2018</p>
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.	Y	<p>CFCS GM:</p> <p><i>9.2.1.2 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.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are equivalent to those defined in PEFC ST 1002:2018</p>



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>9.2.2 Organisation</b>		
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; b) definition of the audit criteria and scope for each audit; c) competence of internal auditor (forest knowledge, standard knowledge); d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process; e) ensuring that the results of the audits are reported to relevant group management; f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.	Y	CFCS GM: <b>9.2.2 Organisation</b> <i>An internal audit programme which shall cover at least:</i> <i>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;</i> <i>b) definition of the audit criteria and scope for each audit;</i> <i>c) competence of internal auditor (forest knowledge, standard knowledge);</i> <i>d) selection of auditors and conducting of audits to ensure objectivity and the impartiality of the audit process;</i> <i>e) ensuring that the results of the audits are reported to relevant group management;</i> <i>f) retaining of the documented information as evidence of the implementation of the audit programme and the audit results.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements
<b>9.3 Selection of participants in the internal audit programme</b>		
<b>9.3.1 General</b>		
<b>9.3.1.1</b> 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); b) determination of sample categories(9.3.3); c) distribution of the sample to the categories (9.3.4); d) selection of the participants (9.3.5).	Y	CFCS GM: <b>9.3.1.1</b> <i>The requirements for the selection of participants in the internal audit programme shall be established and these requirements shall include the following procedures for:</i> <i>a) determination of the sample size (9.3.2);</i> <i>b) determination of sample categories (9.3.3);</i> <i>c) distribution of the sample to the categories (9.3.4);</i> <i>d) selection of the participants (9.3.5).</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements
9.3.1.2 The standard may define additional requirements on the regional, national or sub-national level.	Y	CFCS GM: <i>9.3.1.2 Additional requirements on the regional, national or sub-national level may be defined.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements
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.	Y	CFCS GM: <i>9.3.1.3 Additional sampling requirements shall be defined in case of participation of pre-existing organisations or group or the members participation, such as a forest owners'/managers' association, industry association and SFM programme.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are equivalent to those defined in PEFC ST 1002:2018
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.	Y	CFCS GM: <i>9.3.2.1 The sample size shall be calculated for the participants of the group organisation.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements
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.	Y	CFCS GM: <i>9.3.2.2 The size of the sample generally should be the square root of the number of participants (rounded to the upper whole number)</i> <b>Conclusion: Conformity</b> <b>Justification:</b>



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The definitions are identical to PEFC ST 1002:2018 requirements
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:		
<p>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;</p> <p>b) results of internal audits or previous certification audits;</p> <p>c) quality / level of confidence of the internal monitoring programme;</p> <p>d) use of technologies allowing the gathering of information concerning specified requirements;</p> <p>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.</p> <p>e) based on other means of gathering information about activities on the ground.</p> <p>Note: One way could be a survey with participants who provide some information about their activities on the ground.</p>	Y	<p>CFCS GM:</p> <p><i>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:</i></p> <p><i>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;</i></p> <p><i>b) results of internal audits or previous certification audits;</i></p> <p><i>c) quality / level of confidence of the internal monitoring programme;</i></p> <p><i>d) use of technologies allowing the gathering of information concerning specified requirements;</i></p> <p><i>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.</i></p> <p><i>e) based on other means of gathering information about activities on the ground.</i></p> <p><i>Note: One way could be a survey with participants who provide some information about their activities on the ground.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to PEFC ST 1002:2018 requirements</p>
9.3.3 Determination of sample categories		
9.3.3.1 The sample categories shall be established based on the results of a risk assessment. The indicators used in the risk assessment shall reflect the geographical scope of the standard. The following non exhaustive list of indicators may be used for the risk assessment:		
<p>a) ownership type (e.g. state forest, communal forest, private forest);</p> <p>b) size of management units (different size classes);</p> <p>c) biogeographic region (e.g. lowlands, low mountain range, high mountain range);</p> <p>d) operations, processes and products of potential group</p>	Y	<p>CFCS GM:</p> <p><i>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.</i></p> <p><i>The following non exhaustive list of indicators may be used for the risk assessment:</i></p> <p><i>a) ownership type (e.g. state forest, collective forest);</i></p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>participants;</p> <p>e) deforestation and forest conversion;</p> <p>f) rotation period(s);</p> <p>g) richness of biological diversity;</p> <p>h) recreation and other socio-economic functions of the forest;</p> <p>i) dependence of and interaction with local communities and indigenous people;</p> <p>j) available resources for administration, operations, training and research;</p> <p>k) governance and law enforcement.</p>		<p><i>b) size of management units (different size classes);</i></p> <p><i>c) biogeographic region (e.g. flatlands, hill land, low mountain range, high mountain range);</i></p> <p><i>d) operations, processes and products of potential group participants;</i></p> <p><i>e) deforestation and forest conversion;</i></p> <p><i>f) rotation period(s);</i></p> <p><i>g) richness of biological diversity;</i></p> <p><i>h) recreation and other socio-economic functions of the forest;</i></p> <p><i>i) dependence of and interaction with local communities and indigenous people;</i></p> <p><i>j) available resources for administration, operations, training and research;</i></p> <p><i>k) governance and law enforcement</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are equivalent to those defined in PEFC ST 1002:2018</p>
<p>9.3.3.2 Conditions which constitute risk for each indicator on low, medium and high level and the respective consequences for the sampling shall be defined.</p>	Y	<p>CFCS GM:</p> <p><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.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to PEFC ST 1002:2018 requirements</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>	Y	<p>CFCS GM:</p> <p><i>9.3.4 Distribution of the sample</i></p> <p><i>The sample shall be distributed to the categories according to the result of the risk assessment.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to PEFC ST 1002:2018 requirements</p>



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
9.3.5 Selection of the participants		
9.3.5.1 At least 25% of the sample should be selected at random.	Y	<p>CFCS GM:  <i>9.3.5.1 At least 25% of the sample should be selected at random.</i>  <b>Conclusion: Conformity</b>  <b>Justification:</b>  The definitions are identical to PEFC ST 1002:2018 requirements</p>
9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.	Y	<p>CFCS GM:  <i>9.3.5.2 A risk-based procedure for the selection of the participants shall be specified.</i>  <b>Conclusion: Conformity</b>  <b>Justification:</b>  The definitions are identical to PEFC ST 1002:2018 requirements</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; b) changes in external and internal issues that are relevant to the group management system; 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; d) information on the group performance, including trends in: i. nonconformities and corrective actions; ii. monitoring and measurement results; iii. audit results;	Y	<p>CFCS GM:  <i>9.4.1 An annual management review shall at least include:</i>  <i>a) the status of actions from previous management reviews;</i>  <i>b) changes in external and internal issues that are relevant to the group management system;</i>  <i>c) the status of conformity with the CFCC Forest Management Standard, that includes reviewing the results of the internal monitoring programme, the internal audit and the certification body's evaluations and surveillance;</i>  <i>d) information on the group performance, including trends in:</i>  <i>i. nonconformities and corrective actions; ii. monitoring and measurement results; iii. audit results;</i>  <i>e) opportunities for continual improvement</i>  <b>Conclusion: Conformity</b>  <b>Justification:</b>  The definitions are equivalent to those defined in PEFC ST 1002:2018</p>





PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
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.	Y	<p>CFCS GM:</p> <p><i>9.4.2 The outputs of the management review shall include decisions related to continual improvement opportunities and any need for changes to the group management system.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are equivalent to those defined in PEFC ST 1002:2018</p>
9.4.3 The standard requires that the group organisation shall retain documented information as evidence of the results of management reviews.	Y	<p>CFCS GM:</p> <p><i>9.4.3 The group organisation shall retain documented information as evidence of the results of management reviews.</i></p> <p><b>Conclusion: Conformity</b></p> <p><b>Justification:</b></p> <p>The definitions are identical to PEFC ST 1002:2018 requirements</p>
<b>10. Improvement</b>		
10.1 Nonconformity and corrective action		
10.1.1 The standard requires when a nonconformity occurs, the group organisation shall:		
<p>a) react to the nonconformity and, as applicable:</p> <p>i. take action to control and correct it;</p> <p>ii. deal with the consequences;</p> <p>b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:</p> <p>i. reviewing the nonconformity;</p> <p>ii. determining the causes of the nonconformity;</p> <p>iii. determining if similar nonconformities exist, or could potentially occur;</p> <p>c) implement any action needed;</p> <p>d) review the effectiveness of any corrective action taken;</p> <p>e) make changes to the group management system, if</p>	Y	<p>CFCS GM:</p> <p><i>10.1.1 When a nonconformity occurs, the group organisation shall:</i></p> <p><i>a) react to the nonconformity and, as applicable:</i></p> <p><i>i) take action to control and correct it; ii). deal with the consequences;</i></p> <p><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></p> <p><i>i) reviewing the nonconformity; ii) determining the causes of the nonconformity; iii) determining if similar nonconformities exist, or could potentially occur;</i></p> <p><i>c) implement any action needed;</i></p> <p><i>d) review the effectiveness of any corrective action taken;</i></p> <p><i>e) make changes to the group management system, if necessary</i></p> <p><b>Conclusion: Conformity</b></p>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
necessary.		<b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements
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; b) the results of any corrective action.	Y	CFCS GM: <i>10.1.2 The group organisation shall retain documented information as evidence of:</i> <i>a) the nature of the nonconformities and any subsequent actions taken;</i> <i>b) the results of any corrective action.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements.
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.	Y	CFCS GM: <i>10.1.3 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.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements
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.	Y	CFCS GM: <i>10.2 Continual improvement</i> <i>The suitability, adequacy and effectiveness of the group management system and the sustainable management of the forest shall be continuously improved.</i> <b>Conclusion: Conformity</b> <b>Justification:</b> The definitions are identical to PEFC ST 1002:2018 requirements

## PEFC checklist (5) – Chain of Custody of Forest and Tree Based Products – (PEFC ST 2002:2020)

### 1 Scope

This checklist covers requirements for Chain of Custody as defined in PEFC ST 2002:2020, Chain of Custody of Forest and Tree Based Products.

CFCS reference document:

CFCC has adopted the international PEFC chain of custody standard (PEFC ST 2002:2020) into the CFCS scheme. However, CFCC has modified the standard to comply with the national rules of China. The references to PEFC are replaced with CFCC or CFCS and references to selected international declarations (e.g. ILO) or international organisations (e.g. Transparency International) have been modified. This checklist points out the PEFC requirements where the text in the adopted of custody standard (Part five of the CFCS) differs from the original PEFC ST 2002:2020.	
Part 5 – Chain of custody requirements (CFCC)	January 13, 2022; submitted for assessment April 7, 2022

### 2 Checklist

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>3. Controversial sources definition</b>		
<b>3.7 Controversial sources</b> Forest and tree based material sourced from: a) Activities not complying with applicable local, national or 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; anticorruption and the payment of applicable royalties and taxes.	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 a)
b) Activities where the capability of forests to produce a range of wood and non-wood forest products and services	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 b)



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term.		
c) Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels.	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 c)
d) Activities where ecologically important forest areas are not identified, protected, conserved or set aside.	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 d)
e) Activities where forest conversions occur, in other than justified circumstances where the conversion: <ul style="list-style-type: none"> <li>i. is in compliance with national and regional policy and legislation applicable for land use and forest management, and</li> <li>ii. does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas, and</li> <li>iii. does not destroy areas of significantly high carbon stock, and</li> <li>iv. makes a contribution to long-term conservation, economic, and/or social benefits.</li> </ul>	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 e)
f) Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not met.	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 f)
g) Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met.	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 g)
h) Conflict timber.	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 h)



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
i) Genetically modified trees.	Y	Chain of Custody Requirements (CFCC-2002:2022) 3.7 i)
<b>4. Management system requirements</b>		
<b>4.1 General requirements</b> <b>4.1.1</b> The organisation shall operate a management system in accordance with the requirements of this standard, to ensure correct implementation and maintenance of the PEFC chain of custody process(es). The management system shall be appropriate to the type, range and volume of work performed, and cover outsourced activities relevant for the organisation's chain of custody and all sites in case of multi-site organisations (see Appendix 2).	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.1.1
<b>4.1.2</b> The organisation shall define the scope of its PEFC chain of custody by specifying the PEFC product groups for which the requirements of the PEFC chain of custody are implemented.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.1.2
<b>4.1.3</b> The organisation shall only make PEFC claims and PEFC related statements that are correct to the best of its knowledge and covered by its PEFC chain of custody.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.1.3
<b>4.2 Documented procedures</b> <b>4.2.1</b> The organisation shall establish written documented procedures for its PEFC chain of custody. The documented procedures shall include at least the following elements:	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.2.1 <i>The organization shall establish written documented procedures for its CFCC chain of custody. The documented procedures shall include at least the following elements:</i>
a) responsibilities and authorities relating to the PEFC chain of custody	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.2.1 a) <i>a) responsibilities and authorities relating to the CFCC chain of custody</i>



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
b) description of the raw material flow within the production/trading process(es), including definition of product groups	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.2.1 b)
c) procedures for PEFC chain of custody process(es) covering all requirements of this standard, including: <ul style="list-style-type: none"> <li>i) identification of material categories</li> <li>ii) physical separation of PEFC certified material, PEFC controlled sources material and other material</li> <li>iii) definition of product groups, calculation of certified content, management of credit accounts, transfer to outputs (for organisations applying percentage or credit method)</li> <li>iv) sale/transfer of products and PEFC claims, including documentation in which PEFC claims are made, and other on- and off-product trademark use</li> <li>v) record keeping</li> <li>vi) internal audits and non-conformity control</li> <li>vii) the Due Diligence System</li> <li>viii) complaints resolution</li> <li>ix) outsourcing</li> </ul>	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.2.1 c) <i>procedures for CFCC chain of custody process(es) covering all requirements of this standard, including:</i> <ul style="list-style-type: none"> <li><i>i identification of material categories</i></li> <li><i>ii physical separation of CFCC certified material, CFCC controlled sources material and other material</i></li> <li><i>iii definition of product groups, calculation of certified content, management of credit accounts, transfer to outputs (for organisations applying percentage or credit method)</i></li> <li><i>iv sale/transfer of products and CFCC claims, including documentation in which CFCC claims are made, and other on- and off-product trademark use</i> <ul style="list-style-type: none"> <li><i>i) record keeping</i></li> <li><i>ii) internal audits and non-conformity control</i></li> <li><i>iii) the Due Diligence System</i></li> <li><i>iv) complaints resolution</i></li> <li><i>v) outsourcing</i></li> </ul> </li> </ul>
<b>4.2 Responsibilities and authorities</b> <b>4.3.1 General responsibilities</b> <b>4.3.1.1</b> The organisation's management shall define and document its commitment to implement and maintain the chain of custody requirements in accordance with this standard. The organisation's commitment shall be made	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.3.1.a



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
available to the organisation's personnel, suppliers, customers, and other interested parties		
<b>4.3.1.2</b> The organisation's management shall appoint a member of the management who, irrespective of other responsibilities, shall have overall responsibility and authority for the organisation's PEFC chain of custody.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.3.1.b <i>The organisation's management shall appoint a member of the management who, irrespective of other responsibilities, shall have overall responsibility and authority for the organisation's CFCC chain of custody</i>
<b>4.3.2</b> Responsibilities and authorities for chain of custody The organisation shall identify the personnel performing activities for the implementation and maintenance of its PEFC chain of custody and shall establish personnel responsibilities and authorities for the implementation of the procedures 4.2.1 c) i-viii.  Note: The responsibilities and authorities for the PEFC chain of custody given above can be cumulative.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.3.2 <i>The organisation shall identify the personnel performing activities for the implementation and maintenance of its CFCC chain of custody and shall establish personnel responsibilities and authorities for the implementation of the procedures 4.2.1 c) i-viii.</i>  Note: The responsibilities and authorities for the CFCC chain of custody given above can be cumulative
<b>4.3 Record keeping</b> <b>4.4.1</b> To provide evidence of conformity with the requirements of this standard, the organisation shall establish and maintain at least the following records relating to the product groups covered by its PEFC chain of custody	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 <i>To provide evidence of conformity with the requirements of this standard, the organisation shall establish and maintain at least the following records relating to the product groups covered by its CFCC chain of custody</i>
a) Records of all suppliers of input material delivered with a PEFC claim, including evidence of the suppliers' PEFC certified status.  Note: Evidence can be a print-out from the PEFC website.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 a) <i>Records of all suppliers of input material delivered with a CFCC or CFCC mutually recognized forest certification schemes claim, including evidence of the suppliers' certified status.</i>  Note: Evidence can be a print-out from the CFCC website.
b) Records of all input material, including PEFC claims and documents associated to the delivery of the input material, and for recycled input material, information	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 b)



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
demonstrating that the definition of recycled material is met.		<i>Records of all input material, including CFCC claims or CFCC mutually recognized forest certification schemes claim and documents associated to the delivery of the input material, and for recycled input material, information demonstrating that the definition of recycled material is met.</i>
c) Records of calculation of the certified content, transfer of the percentage to output products and management of the credit account, as applicable.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 c)
d) Records of all products sold/transferred, including PEFC claims and documents associated to the delivery of the output products.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 d) <i>Records of all products sold/transferred, including CFCC claims and documents associated to the delivery of the output products</i>
e) Records of the Due Diligence System, including records of risk assessments and significant risk supplies management, as applicable.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 e)
f) Records of internal audits, periodic chain of custody review, non-conformities and corrective actions.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 f)
g) Records on complaints and their resolution.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.1 g)
<b>4.4.2</b> The organisation shall maintain the records for a minimum period of five years.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.4.2
<b>4.5 Resource management</b> <b>4.5.1</b> Human resources/personnel The organisation shall ensure and demonstrate that all personnel performing activities affecting the implementation and maintenance of its PEFC chain of custody are competent on the basis of appropriate training, education, skills and experience.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.5.1 <i>The organisation shall ensure and demonstrate that all personnel performing activities affecting the implementation and maintenance of its CFCC chain of custody are competent on the basis of appropriate training, education, skills and experience</i>
<b>4.5.2</b> Technical facilities	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.5.2



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
The organisation shall identify, provide and maintain the infrastructure and technical facilities needed for effective implementation and maintenance of its PEFC chain of custody with the requirements of this standard.		<i>The organisation shall identify, provide and maintain the infrastructure and technical facilities needed for effective implementation and maintenance of its CFCC chain of custody with the requirements of this standard</i>
<b>4.6 Inspection and control</b> 4.6.1 The organisation shall conduct internal audits at least annually, and prior to the initial certification audit, covering its compliance with all requirements of this standard applicable to the organisation, including activities covered by outsourcing, and establish corrective and preventive measures if required. <i>Note:</i> Informative guidance for performing internal audits is given in ISO 19011.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.6.1
<b>4.6.2</b> The organisation's management shall review the result of the internal audit and the organisation's PEFC chain of custody at least annually.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.6.2 <i>The organisation's management shall review the result of the internal audit and the organisation's CFCC chain of custody at least annually.</i>
<b>4.7 Complaints</b> 4.7.1 The organisation shall establish procedures for dealing with complaints from suppliers, customers and other parties relating to its chain of custody, reflecting the requirements of 4.7.2.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.7.1
<b>4.7.2</b> Upon receipt of a complaint in writing, the organisation shall:	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.7.2
a) formally acknowledge the complaint to the complainant within ten workdays	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.7.2 a)
b) gather and verify all necessary information to evaluate and validate the complaint and make a decision on the complaint	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.7.2 b)





**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
c) formally communicate the decision on the complaint and of the complaint handling process to the complainant	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.7.2 c)
d) ensure that appropriate corrective and preventive actions are taken, if necessary	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.7.2 d)
<b>4.8 Nonconformity and corrective action</b> <b>4.8.1</b> When a nonconformity with the requirements of this standard is identified through internal or external auditing, the organisation shall:	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.1
a) react to the nonconformity and, as applicable: i. take action to control and correct it ii. address the consequences	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.1 a)
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	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.1 b)
c) implement any action needed	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.1 c)
d) review the effectiveness of any corrective action taken	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.1 d)
e) make changes to the management system, if necessary	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.1 e)
<b>4.8.2</b> Corrective action shall be appropriate to the effects of the nonconformities encountered.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.2
<b>4.8.3</b> The organisation shall retain documented information as evidence of:	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.3



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
a) the nature of the nonconformities and any subsequent actions taken	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.3 a)
b) the results of any corrective action	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.8.3 b)
<b>4.9 Outsourcing</b> <b>4.9.1</b> The organisation may outsource activities covered by its PEFC chain of custody to another entity.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.9.1 <i>The organisation may outsource activities covered by its CFCC chain of custody to another entity.</i>
<b>4.9.2</b> Through all stages of outsourcing the organisation shall be responsible for ensuring that all outsourced activities meet the requirements of this standard, including management system requirements. The organisation shall have a written agreement with all entities to whom activities have been outsourced, ensuring that:	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.9.2 <i>Through all stages of outsourcing the organisation shall be responsible for ensuring that all outsourced activities meet the requirements of this standard, including management system requirements. The organisation shall have a written agreement with all entities to whom activities have been outsourced, ensuring that:</i>
a) The material/products covered by the organisation's PEFC chain of custody are physically separated from other material or products.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.9.2 a) <i>The material/products covered by the organisation's CFCC chain of custody are physically separated from other material or products.</i>
b) The organisation has access to the entity's site(s) for internal and external auditing of outsourced activities for conformity with the requirements of this standard. <i>Note 1: A template for an outsourcing agreement can be obtained from the PEFC Council and PEFC authorised bodies.</i> <i>Note 2: Internal audits of outsourced activities should be conducted at least annually and before the outsourced activity starts.</i>	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.9.2 b) <i>The organisation has access to the entity's site(s) for internal and external auditing of outsourced activities for conformity with the requirements of this standard.</i> <i>Note 1: A template for an outsourcing agreement can be obtained from the CFCC and CFCC authorised bodies.</i> <i>Note 2: Internal audits of outsourced activities should be conducted at least annually and before the outsourced activity starts</i>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p><b>4.10 Social, health and safety requirements in chain of custody</b></p> <p>This clause includes requirements relating to health, safety and labour issues that are based on ILO Declaration on Fundamental Principles and Rights at Work (1998).</p>	Y	<p>Chain of Custody Requirements (CFCC-2002:2022) 4.10</p> <p>This clause includes requirements relating to health, safety and labour issues that are based on ILO Declarations which were signed by China.</p> <p><b>Comment</b></p> <p>The ILO Conventions signed by China do not set equal requirements than the ILO Declarations on Fundamental Principles and Right at Work (1998). China has not ratified According to Country Baseline Under the ILO Declaration Annual Review (2019) <i>China has ratified neither the Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) (C.87) nor the Right to Organize and Collective Bargaining Convention, 1949 (No. 98) (C.98)</i> and it had no intention to proceed with the ratification. However, the same review reports that <i>The Labour Contract Law of China, which entered into force as of 2008, devotes a special section to explicit provisions on issues such as special collective contracts, industry-wide or region-wide collective contracts, the labour remuneration and the standards for working conditions stipulated in a collective contract and dispute resolution over the collective contracts. Besides, the Company Law and the Law on Prevention and Control of Occupational Diseases also provide for a collective contract.</i></p> <p>Thus the CFCC COC-2002:2022 provisions are compatible with PEFC ST 2002:2020.</p>
<b>4.10.1</b> The organisation shall demonstrate its commitment to comply with the social, health and safety requirements defined in this standard.	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.10.1
<b>4.10.2</b> The organisation shall demonstrate that:	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.10.2 a)-m)
a) workers are not prevented from associating freely, choosing their representatives and bargaining collectively with their employer	Y	<p>Chain of Custody Requirements (CFCC-2002:2022) 4.10.2</p> <p>a) <i>Guarantee the right of workers to participate in and organize trade unions, choose their own representatives and negotiate with employers;</i></p> <p>k) <i>The enterprise may establish a labor dispute mediation committee. The labor dispute mediation committee is composed of employee representatives, unit representatives and trade union representatives. The director of the labor dispute mediation committee is</i></p>



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>represented by a trade union. Where an employment dispute is reached through mediation, the parties shall perform;</p> <p>l) If the enterprise has one of the following violations of the lawful rights and interests of laborers, it shall pay wages, economic compensation, and compensation for the laborers according to law:</p> <ul style="list-style-type: none"> <li>- deducting or unreasonably defaulting on the wages of workers;</li> <li>- refusing to pay the laborer to extend the working hours wages;</li> <li>- paying the wages of workers below the local minimum wage;</li> <li>- after the labor contract was terminated, the laborer was not compensated economically in accordance with the law.</li> </ul> <p>m) Employees and enterprises can conclude collective contracts on matters such as labor remuneration, working hours, rest and vacation, labor safety and health, and insurance benefits through equal consultation. The draft of the collective contract shall be submitted to the employee representative assembly or all employees for discussion and approval. The collective contract shall be concluded by the trade union on behalf of the enterprise employee and the enterprise; if the enterprise has not yet established a trade union, the representative recommended by the higher-level trade union shall be concluded with the enterprise.</p>
b) forced labour is not used	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.10.2 b <i>b) Forced labour is not used</i>
c) workers, who are under the minimum legal age, the age of 15, or the compulsory school attendance age, whichever is higher, are not used	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.10.2 <i>c) legal minimum age 16 years</i>
d) workers are not denied equal employment opportunities and treatment	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.10.2 e)
e) working conditions do not endanger safety or health	Y	Chain of Custody Requirements (CFCC-2002:2022) 4.10.2 g), h), i), j) <i>d) Establish a working hour system with a daily working time of no more than 8 hours and an average weekly working time of no more than 44 hours</i>



**Indufor**

PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p><i>h) Ensure that the enterprise provides labor safety and sanitation conditions and necessary labor protection rules in accordance with state regulations, and that workers who engage in occupational hazards should conduct regular health checks;</i></p> <p><i>i) Ensure that enterprises conduct statistics, reports and treatments on the casualties of workers during the labor process and the occupational diseases of workers;</i></p> <p><i>j) The enterprise may establish supplementary insurance for the workers according to the actual situation;</i></p>
<b>5. Identification of inputs and declaration of outputs</b>		
<b>5.1 Identification of input material</b> <b>5.1.1</b> For each delivery of material used as input for a PEFC product group the organisation shall obtain documentation with the following information from the supplier:	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 <i>5.1.1 For each delivery of material used as input for a CFCC product group the organisation shall obtain documentation with the following information from the supplier:</i>
a) supplier identification	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 a)
b) product identification	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 b)
c) quantity of products	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 c)
d) delivery identification based on date of delivery, delivery period, or accounting period	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 d)
For inputs with a PEFC claim the document shall also include:		
e) the organisation's name as the PEFC customer of the delivery	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 e)



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<i>the organisation's name as the CFCC customer of the delivery</i>
f) the applicable PEFC claim specifically for each claimed product covered by the documentation	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 f) <i>the applicable CFCC claim specifically for each claimed product covered by the documentation</i>
g) the certificate number of the supplier's PEFC recognised certificate  <i>Note 1: The certificate number is a numerical or alpha-numerical combination, which is a unique identifier of the certificate.</i>  <i>Note 2: An example of delivery documentation is an invoice or delivery note providing the information required.</i>	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.1.1 g) <i>the certificate number of the supplier's CFCC recognised certificate</i>
<b>5.1.2 Identification at supplier level</b>  5.1.2.1 For all inputs delivered with a PEFC claim the organisation shall verify that the supplier is covered by a PEFC recognised certificate on the PEFC website.	N	Chain of Custody Requirements (CFCC-2002:2022) 5.1.2.1 <i>For all inputs delivered with a CFCC claim or CFCC mutually recognized forest certification schemes claim the organisation shall verify that the supplier is covered by a CFCC recognised certificate on the CFCC/PEFC website</i>  <b>Conclusion: Minor non-conformity</b> CFCC does not define what are the CFCC mutually recognised forest schemes, therefore it is unclear what a CFCC mutually recognized forest certification claim may be. CFCC shall define what they refer to as mutually recognised forest schemes in order to ensure that material entering the CFCC COC is acceptable in terms of PEFC COC requirements and claim. CFCS scheme includes certification programs that are not endorsed by PEFC and CFCS certified fiber may enter into PEFC COC from those sources. CFCS has PEFC compatible requirements to eliminate material from uncontrolled sources.



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		The gaps in defining in detail the CFCC mutually recognized forest certification schemes raise a minor NC and is linked to the other deficiencies in defining the material flow between CFCS and PEFC certified and labelled sources.
<b>5.1.2.2</b> For each delivery of material used as input for a PEFC product group the organisation shall classify the material category of the procured material.	N	<p>Chain of Custody Requirements (CFCC-2002:2022) 5.1.2.2</p> <p><i>For each delivery of material used as input for a CFCC product group the organisation shall classify the material category of the procured material</i></p> <p><b>Conclusion: Minor non-conformity</b></p> <p>CFCS does not define how materials and claims entering from CFCS COC system to PEFC COC system are classified and how claims are transferred between the schemes. CFCS COC standard shall be more specific in its rules to recognize CFCS certified share of material o under percentage/credit or physical separation methods as PEFC certified material under its labelling rules. The description shall also cover the material flow from PEFC labelled sources to CFCS labelled products and material from controlled sources. Product groups alone do not set adequate specifications for materials.</p>
<b>5.2 Declaration of outputs</b> <b>5.2.1</b> For outputs from a PEFC product group for which the organisation makes a PEFC claim to a PEFC customer, it shall provide the customer with documentation providing the following information for each delivery:	Y	<p>Chain of Custody Requirements (CFCC-2002:2022) 5.2.1</p> <p><i>1 For outputs from a CFCC product group for which the organisation makes a CFCC claim to a CFCC customer, it shall provide the customer with documentation providing the following information for each delivery</i></p>
a) PEFC customer identification	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.2.1 a) CFCC customer identification
b) the organisation's name as the supplier of the material	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.2.1 b) the organisation's name as the supplier of the material
c) product identification	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.2.1 c) product identification
d) quantity of product(s)	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.2.1 d) quantity of product(s)



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
e) date of delivery / delivery period / accounting period	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.2.1 e) date of delivery/ delivery period/ accounting period
f) the applicable PEFC claim specifically for each claimed product covered by the documentation	N	<p>Chain of Custody Requirements (CFCC-2002:2022) 5.2.1 f) the applicable CFCC claim specifically for each claimed product covered by the documentation</p> <p><b>Conclusion: Minor non-conformity</b> CFCS COC standard shall be more specific in defining the flow of certified fiber between PEFC and CFCS COC certified sources. In addition.</p> <p>CFCS shall require that products have PEFC official claims when they are entering into the production of a PEFC COC certified company</p> <p>(cf. PEFC ST 2002 3.24 definition for certified material: Material category for: a) Forest and tree- based material delivered by a supplier covered by a PEFC recognised certificate, with the PEFC claim “x% PEFC certified”, or delivered by a supplier covered by a PEFC recognised certificate against a forest management standard that is endorsed by PEFC with another PEFC endorsed system claim.)</p>
g) the certificate number of the organisation’s PEFC recognised certificate <i>Note:</i> The certificate number is a numerical or alpha-numerical combination which is a unique identifier of the certificate.	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.2.1 g)
<b>5.2.2</b> The organisation shall specify the type of documentation in which PEFC claims on outputs are made	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.2.2
<b>5.3 Trademark use</b> <b>5.3.1</b> The use of the PEFC trademarks i.e. PEFC logo and labels, chain of custody claims on-product and PEFC initials, shall be in compliance with PEFC ST 2001, PEFC Trademarks Rules – Requirements.	N	<p>Part One – The Chinese Forest Certification Scheme and its Implementation Arrangements 2022</p> <p><i>9.2. The use of PEFC logo by certificate holders and certification bodies in China shall comply with the PEFC ST 2001:2020 (PEFC Trademarks Rules –Requirements).</i></p> <p><b>Conclusion: Minor non-conformity</b></p>





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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
		<p>The CFCS implementation arrangements define that the use of PEFC logo on CFCS certified products shall comply with the PEFC ST 2001:2020. However, this requirement is not clearly stated in the CFCS COC or labelling rules.</p> <p>Although CFCC is the national PEFC governing body in China, the PEFC China office holds the right to issue PEFC trademark licenses. The scheme does not describe the sharing of responsibilities between the two organisations. It is also vague in recognising the certified content in material flows between PEFC and CFCS labelled products.</p>
<b>5.3.2</b> In order to enable the organisation to use the PEFC trademarks in accordance with the PEFC Trademarks Rules, the organisation shall obtain a valid trademark license from the PEFC Council or another PEFC authorised body.	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.3.2
<b>5.4 Content of recycled material</b> <b>5.4.1</b> For products covered by the organisation's PEFC chain of custody that include recycled material, the organisation shall calculate the content of recycled material based on ISO 14021 and inform about it upon request.	Y	Chain of Custody Requirements (CFCC-2002:2022) 5.4.1
<b>6. Chain of custody methods</b>		
<b>6.1 General</b> <b>6.1.1</b> There are three methods to implement the PEFC chain of custody, namely the physical separation method, the percentage method and the credit method. Depending on the nature of material flows and processes, the organisation shall choose the appropriate method.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.1.1 PEFC is replaced with CFCC
<b>6.1.2</b> The organisation shall implement the chosen chain of custody method(s) of this standard for specific PEFC product groups.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.1.2



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>6.1.3</b> PEFC product groups shall be established for products with equivalent input material, with the same measurement unit or units that can be converted into a single measurement unit.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.1.3
<b>6.1.4</b> The organisation shall only use PEFC certified material and PEFC controlled sources material as input for PEFC product groups.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.1.4
<b>6.2 Physical separation method</b> <b>6.2.1</b> The organisation applying the physical separation method shall ensure that material with different material categories and different certified content are kept separate or clearly identifiable at all stages of the production or trading process.  <i>Note:</i> Physical separation can be achieved by any means ensuring that material category and certified content can be identified, for example, through separate storage, marking, distinguishing product characteristics or production time.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.2.1  PEFC is replaced with CFCC
<b>6.2.2</b> Where material with different certified content is used as input in the same PEFC product group, the organisation shall use the lowest certified content of the input as certified content of the output.  <i>Example:</i> An organisation using material with 100%, 75% and 70% certified content as input in the same PEFC product group under the physical separation method can claim the output as 70% PEFC certified.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.2.2
<b>6.2.2.1</b> Where PEFC certified material and PEFC controlled sources material is used as input in the same PEFC product group under the physical separation method, the organisation shall claim the output as PEFC controlled sources.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.2.2.1
<b>6.3 Percentage method</b>	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.3.1



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>6.3.1</b> The percentage method may be implemented to calculate the certified content of PEFC product groups for which PEFC certified material and PEFC controlled sources material were used as input material.		
<b>6.3.2</b> Calculation of certified content <b>6.3.2.1</b> The organisation shall calculate the certified content separately for each PEFC product group and for a specific claim period according to the following formula: $Cc [\%] = (Vc / (Vc + Vcm)) \times 100$ (Cc: certified content; Vc: volume of PEFC certified material; Vcm: volume of PEFC controlled sources material) Note: Neutral material is not considered in the calculation of the certified content	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.3.2.1  PEFC is replaced with CFCC
<b>6.3.2.2</b> The organisation shall calculate the certified content based on a single measurement unit used for all material covered by the calculation. In case of conversion to a single measurement unit for calculation purposes, the organisation shall only use generally recognised conversion ratios and methods. If a suitable, generally recognised conversion ratio does not exist, the organisation shall define and use a reasonable and credible conversion ratio.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.3.2.2
<b>6.3.2.3</b> If input material/products include only a proportion of PEFC certified material, then only the quantity corresponding to the certified content shall enter the calculation formula as PEFC certified material. The rest of the material shall enter the calculation as PEFC controlled sources material.  <i>Example:</i> 1t of material delivered with the PEFC claim “70% PEFC certified” and 1t of material delivered with the PEFC claim “100% PEFC certified” are used as input. Using the formula under 6.3.3.1 the certified content is $Cc[\%] =$	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.3.2.3



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
$\frac{((700\text{kg}+1000\text{kg}))}{((700+1000)+300)} \times 100 = \frac{(1700)}{(2000)} \times 100 = 2\text{t of 85\% PEFC certified material.}$		
<p><b>6.3.3</b> The certified content calculated for a PEFC product group shall be used as percentage in the PEFC claim “X% PEFC certified”.</p> <p><i>Example:</i> If the certified content of a PEFC product group has been calculated as being 54% for a specific claim period, all products covered by the product group can, during this claim period, be sold/ transferred as PEFC certified products with the PEFC claim “54 % PEFC certified”.</p> <p><i>Note:</i> This standard does not define a minimum threshold for the certified content that needs to be met in order to communicate the certified content of a PEFC certified product with the PEFC claim X% PEFC certified. However, minimum thresholds for the use of the PEFC trademarks on-product are defined in the PEFC Trademarks Rules, PEFC ST 2001.</p>	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.3.3
<p><b>6.3.4</b> The organisation may apply the percentage method as rolling percentage.</p>	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.3.4
<p><b>6.3.5</b> The organisation applying rolling percentage shall calculate the certified content of a PEFC product group and claim period based on material procured during an input period preceding the claim period. The claim period, in the case of rolling percentage, shall not exceed 3 months and the input period shall not exceed 12 months.</p> <p><i>Example:</i> An organisation that has chosen a 3-month claim period and a 12-month input period calculates the certified content for the coming three months based on the input material procured in the previous 12 months.</p>	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.3.5
<p><b>6.4 Credit method</b></p>	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.1



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<b>6.4.1</b> The credit method may be implemented to transfer credits gained from the input of PEFC certified material to PEFC controlled sources material within the same PEFC product group.		PEFC is replaced with CFCC
<b>6.4.2</b> The organisation shall create and manage a credit account for credits gained from input of PEFC certified material. The credits shall be calculated in a single measurement unit. It may be required to define conversion factor(s) for the conversion of the measurement unit(s) of the input components to the output products.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.2
<b>6.4.3</b> The total quantity of credits accumulated in the credit account shall not exceed the sum of credits entered into the credit account during the last 24 months. The 24-month maximum period may be extended, where the organisation can demonstrate that the average production period of the product in question is longer than 24 months.  <i>Example:</i> If the average production period of a product (including maturing, for example) is 36 months, the organisation can extend the 24-month maximum period for the accumulation of credits to 36 months.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.3
<b>6.4.4</b> The organisation shall apply the credit method for a single claim. The organisation receiving a delivery of material with a PEFC claim and a claim against another certification system, shall either use it as a combined credit covering both claims or shall only use one of the received claims for calculating the volume credits.  <i>Example:</i> An organisation receiving a delivery of material with two claims relating to two certification systems either establishes a credit account for the multiple claim (e.g. PEFC certified/[other system claim]) or decides, which single claim	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.4



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
(either PEFC certified or [other system claim]) will be entered into the respective volume credit account.		
<b>6.4.5</b> The organisation shall calculate the credits using either: a) certified content and volume of output products (clause 6.4.8) or b) input material and input-to-output ratio (clause 6.4.7)	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.5 a) b)
<b>6.4.6</b> The organisation applying the credit method shall calculate the credits by multiplying the volume of output products of the claim period with the certified content for the relevant claim period.  <i>Example:</i> If the certified content for the product group of the specific claim period, which consists of 100 tons of output products, is 54%, the organisation achieves volume credits equal to 54 tons (100 x 0.54) of the output products.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.6
<b>6.4.7</b> The organisation that can demonstrate a verifiable ratio between the input material and output products, may calculate the credits directly from input of PEFC certified material by multiplying the volume of PEFC certified material input with the input-to-output ratio.  <i>Example:</i> If the volume of PEFC certified material input is 70 m <sup>3</sup> (e.g. 100 m <sup>3</sup> with the PEFC claim “70% PEFC certified”) and the input-to-output ratio is 0.60 (e.g. 1 m <sup>3</sup> of roundwood results in 0.60 m <sup>3</sup> of sawn wood), the organisation acquires volume credits equal to 42 m <sup>3</sup> (i.e. 70 m <sup>3</sup> x 0.60) of sawn wood.	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.7
<b>6.4.8</b> The organisation shall distribute the credits from the credit account to the output products covered by the credit account. The credits shall be distributed to the output products in a way that the certified products will be considered as either having 100% certified content or as having less than 100% certified content and meeting the organisation’s own	Y	Chain of Custody Requirements (CFCC-2002:2022) 6.4.8



PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
<p>threshold. The result of the volume of output products multiplied by the certified content of the output products shall be equal to the distributed credits withdrawn from the credit account.</p> <p><i>Example:</i> The organisation can use 7 units of credits to sell 7 units as 100% PEFC certified, or to sell 10 units as 70% PEFC certified.</p>		
<b>7. Due Diligence System (DDS) requirements</b>		
<p><b>7.1 General</b></p> <p><b>7.1.1</b> For all material used as input for a PEFC product group, except recycled material, the organisation shall exercise due diligence in line with the PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources laid down in Appendix 1 of this standard. Thereby the organisation shall establish that for material used as input for PEFC product groups there is “negligible risk” that it originates from controversial sources and that it meets the definition of PEFC controlled sources material.</p>	Y	<p>Chain of Custody Requirements (CFCC-2002:2022) 7.1.1</p> <p>Reference to CFCC product groups, whose definition is identical to the PEFC product groups</p>
<p><b>7.1.2</b> For PEFC product groups where only input material used was delivered with a PEFC claim by a supplier covered by a PEFC recognised certificate, an organisation may implement the PEFC DDS by meeting the following requirements:</p>	Y	<p>Chain of Custody Requirements (CFCC-2002:2022) 7.1.2</p>
<p>a) In order to enable PEFC certified and uncertified entities further down the supply chain to implement a DDS, the</p>	Y	<p>Chain of Custody Requirements (CFCC-2002:2022) 7.1.2 a)</p>



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PEFC benchmark requirement	YES / NO	Reference to system documentation (including quotation of relevant text)
organisation shall, upon request, provide the information specified in Appendix 1, 2.1 for material passed on with a PEFC claim. If the organisation does not possess the requested information, the request shall be passed on to relevant supplier(s) of the organisation (Appendix 1, 2.2).		
b) Where internal or external substantiated concerns on the origin of input material from controversial sources are raised, the organisation shall follow up on these concerns following Appendix 1, 4.	Y	Chain of Custody Requirements (CFCC-2002:2022) 7.1.2 b)
c) The organisation shall define, document and implement a commitment and a procedure, also covering forest and tree based material/products not covered by the organisation's PEFC chain of custody, ensuring that where it is known to the organisation, or where it has received substantiated concerns, that forest and tree based material/products originates in illegal sources (controversial sources, 3.7a), it shall not be placed on the market until the concern has been resolved in accordance with Appendix 1, 4	Y	Chain of Custody Requirements (CFCC-2002:2022) 7.1.2 c)



## Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources

### Normative Appendix

PEFC benchmark requirement	YES / NO*	Reference to system documentation
<b>1. General requirements</b>		
<b>1.1</b> In order to help ensure that activities conducted by the organisation under the scope of this standard conform to all applicable timber legality legislation, including trade and customs laws, and to minimise the risk that the procured material originates in controversial sources, the organisation shall operate a Due Diligence System (DDS), in accordance with the following elements of this standard.	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources 1.1</b>
<b>1.2</b> The PEFC DDS shall be implemented for all input forest and tree based material covered by the organisation's PEFC chain of custody and PEFC product groups, with the exception of recycled material.  <i>Note:</i> The DDS can be implemented by an organisation for forest and tree based products from forests under its own management.	Y	CFCC-2002:2022-Appendix 1: 1.2  PEFC is replaced with CFCC
<b>1.3</b> The organisation shall implement the PEFC DDS in three steps relating to:  a) gathering information b) risk assessment c) management of significant risk supplies	Y	CFCC-2002:2022-Appendix 1: 1.3
<b>1.4</b> The organisation procuring raw material originating from species listed in Appendix I to III of CITES shall comply with applicable legislation relating to CITES.	Y	CFCC-2002:2022-Appendix 1: 1.4



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
<b>2. Access to information</b>		
<b>2.1</b> In order to enable the organisation to implement the PEFC DDS, the organisation shall have access to the following information from its supplier(s):	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources 2.1</b>
a) Identification of tree species included, or list of tree species potentially included, in the material/ product by their common name and/or their scientific name where applicable.	Y	CFCC-2002:2022-Appendix 1: 2.1 a)
b) Country of harvest of the material and where applicable sub-national region and/or concession of harvest. <i>Note 1:</i> Access to the scientific name of species is required in cases where the usage of a common name could pose a risk of wrong identification of the species.  <i>Note 2:</i> Usage of a trade name of species is considered as equivalent to the common name in cases where all species covered by the trade name have an equivalent risk of originating in controversial sources.  <i>Note 3:</i> Access to the sub-national level of the material origin is required in cases where sub-national regions within one country do not represent an equivalent risk relating to the controversial sources.  <i>Note 4:</i> The term “concession of harvest” refers to a contract for harvest in a geographically defined forest area.  <i>Note 5:</i> The term “country/region” is further used throughout this clause to identify a country, a sub-national region or a concession of harvest of the material/product origin.	Y	CFCC-2002:2022) -Appendix 1: 2.1 b)
<b>2.2</b> In order to enable PEFC certified and uncertified entities further down the supply chain to implement a DDS, the organisation shall, upon request, provide the information specified in 2.1 of this appendix for material passed on with a	Y	CFCC-2002:2022) -Appendix 1: 2.2



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
PEFC claim. If the organisation does not possess the requested information, the request shall be passed on to relevant supplier(s) of the organisation.		
<b>3. Risk assessment</b>		
<b>3.1</b> The organisation shall carry out a risk assessment, assessing the risk of procuring raw material from controversial sources for all input forest and tree based material covered by the organisation's PEFC chain of custody, with the exception of material/products delivered with a PEFC claim by a supplier with a PEFC recognised certificate, as this material can be considered as having "negligible risk" of originating in controversial sources.	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources</b> 3.1 The organisation shall carry out a risk assessment, assessing the risk of procuring raw material from controversial sources for all input forest and treebased material covered by the organisation's CFCC chain of custody, with the exception of material/products delivered with a CFCC claim by a supplier with a CFCC recognised certificate, as this material can be considered as having "negligible risk" of originating in controversial sources
<b>3.2</b> The organisation's risk assessment shall result in the classification of material into "negligible" or "significant" risk category.	Y	CFCC-2002:2022-Appendix 1: s 3.2
<b>3.3</b> The organisation's risk assessment shall be based on the indicators for risk at origin and supply chain level listed in tables 1- 3 below.	Y	CFCC-2002:2022-Appendix 1: 3.3
<b>3.4</b> Where the organisation's risk assessment identifies indicators specified in table 1, the organisation may consider the material as having "negligible risk" to originate in controversial sources, and conclude the risk assessment without having to consider the indicators outlined in tables 2 and 3.	Y	CFCC-2002:2022-Appendix 1: 3.4
<b>3.5</b> Where the organisation's risk assessment does not identify indicators specified in table 1, the risk assessment shall be continued against indicators outlined in tables 2 and 3; and where any of these indicators apply, the organisation	Y	CFCC-2002:2022-Appendix 1: 3.5



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
shall consider the material as having “significant risk” to originate in controversial sources.		
<b>3.6</b> Where none of the indicators outlined in tables 2 and 3 are identified, the organisation may consider the supplies as having “negligible risk” to originate in controversial sources, and conclude the risk assessment.	Y	CFCC-2002:2022-Appendix 1: 3.6
<b>Table 1: List of indicators for negligible risk</b>		
<b>Indicators</b>		
a) Supplies declared as certified against a forest certification system (other than PEFC endorsed), addressing the activities covered by the term controversial sources, supported by a forest management, chain of custody or fibre sourcing certificate issued by a third party certification body.	Y	CFCC-2002:2022- <b>Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources</b> Table 1: List of indicators for negligible risk Indicators a)
b) Supplies verified by governmental or non-governmental verification or licensing mechanisms other than forest certification systems, addressing the activities covered by the term controversial sources.	Y	CFCC-2002:2022-Appendix 1 Table 1: List of indicators for negligible risk Indicators b)
c) Supplies supported by verifiable documentation that clearly identifies:	Y	CFCC-2002:2022-Appendix 1: Table 1: List of indicators for negligible risk Indicators c)
i. country of harvest and/or sub-national region where the timber was harvested, where the latest Transparency International (TI) Corruption Perception Index (CPI) score is higher than 50, or where the latest World Justice Project (WJP) Rule of Law Index is higher than 0,5, and	Y	CFCC-2002:2022-Appendix 1: Table 1: List of indicators for negligible risk Indicators c) i i. country of harvest and/or sub-national region where the timber was harvested, where <i>the latest Corruption Perception Index (CPI) score published by an internationally recognized organization</i> is higher than 50, or where the latest international recognized Rule of Law Index is higher than 0,5, and



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PEFC benchmark requirement		YES / NO*	Reference to system documentation
ii.	trade name and type of product as well as the common name of tree species and, where applicable, its full scientific name, and	Y	CFCC-2002:2022-Appendix 1: Table 1: List of indicators for negligible risk Indicators c) ii
iii.	all suppliers within the supply chain, and	Y	CFCC-2002:2022) -Appendix 1: Table 1: List of indicators for negligible risk Indicators c) iii
iv.	the forest area of the supply origin, and	Y	CFCC-2002:2022-Appendix 1: Table 1: List of indicators for negligible risk Indicators c) iv
v.	documents, including contractual agreements and self-declarations, or other reliable information indicating that products do not originate from <b>controversial sources</b> .	Y	CFCC-2002:2022-Appendix 1: Table 1: List of indicators for negligible risk Indicators c) v
<b>Table 2: List of indicators for significant risk at origin level</b>			
<b>Indicators</b>			
a)	Activities not complying with applicable local, national or 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; anticorruption and the payment of applicable royalties and taxes.	Y	Chain of Custody Requirements (CFCC-2002:2022) - <b>Appendix A: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources</b> Table 2: List of indicators for significant risk at origin level a)
i.	The latest Transparency International (TI) Corruption Perception Index (CPI) score of the country is lower than 50 or the latest World Justice Project (WJP) Rule of Law Index of the country is lower than 0,5	Y	CFCC-2002:2022-Appendix A: Table 2: List of indicators for significant risk at origin level a) i  <i>The latest Corruption Perception Index (CPI) score published by an internationally recognized organization for the country is lower than 50 or the latest international recognized Rule of Law Index of the country is lower than 0,5.</i> Note 4)These indices might not always be appropriate for forestry. Where more appropriate indicators exist, these can be used with a prior agreement with the CFCC/PEFC



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
		Council. These alternative indicators will be listed in the chain of custody guidance document
ii. The country/region is known as a country with low level of forest governance and law enforcement.	Y	CFCC-2002:2022 -Appendix A: Table 2: List of indicators for significant risk at origin level a) ii
iii. Tree species included in the material/product is known as species with prevalence of activities covered by the term <b>controversial sources</b> (a) or (b) in the country/region.	Y	CFCC-2002:2022) -Appendix A: Table 2: List of indicators for significant risk at origin level a) iii
iv. The country is covered by UN, EU or national government sanctions restricting the export/import of such <b>forest and treebased products</b>	Y	CFCC-2002:2022 Appendix A: Table 2: List of indicators for significant risk at origin level a) iv
<b>b)</b> <i>Activities where the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term.</i>	Y	CFCC-2002:2022-Appendix A: Table 2: List of indicators for significant risk at origin level b)
i. According to publically available data, such as FAO Forest Resource Assessments, the amount of annual harvest of industrial roundwood exceeds the amount of annual increment of growing stock of the country/ region of origin.	Y	CFCC-2002:2022-Appendix A: Table 2: List of indicators for significant risk at origin level b) i
<b>c)</b> <i>Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels.</i>	Y	Chain of Custody Requirements (CFCC-2002:2022) -Appendix A: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources Table 2: List of indicators for significant risk at origin level c)
<b>d)</b> <i>Activities where ecologically important forest areas are not identified, protected, conserved or set aside.</i>	Y	CFCC-2002:2022-Appendix A: Table 2: List of indicators for significant risk at origin level d)
i. The Environmental Performance Index (EPI) score for "Biodiversity & Habitat" of the country is lower	Y	CFCC-2002:2022-Appendix A: Table 2: List of indicators for significant risk at origin level d) i



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
than 50. Where no EPI index exists for a certain country, other indicators may be utilised, such as legislation addressing <b>controversial sources</b> elements c and d, combined with evidence of reliable enforcement of legislation (TI CPI score >50, or WJP Rule of Law score >0.5).		
<p><b>e)</b> <i>Activities where forest conversions occur, in other than justified circumstances where the conversion:</i></p> <ul style="list-style-type: none"> <li><i>i. is in compliance with national and regional policy and legislation applicable for land use and forest management; and</i></li> <li><i>ii. does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and</i></li> <li><i>iii. does not destroy areas of significantly high carbon stock; and</i></li> <li><i>iv. makes a contribution to long-term conservation, economic, and/or social benefits.</i></li> </ul>	Y	CFCC-2002:2022 -Appendix A: Table 2: List of indicators for significant risk at origin level e)
<p>i. The country/region has been identified as having had a net loss of forest area &gt;1% over the most recent ten years of available data, according to publically available data or information, such as provided by the FAO.</p>	Y	CFCC-2002:2022 -Appendix A Table 2: List of indicators for significant risk at origin level e) i
<p>ii. In the country/region the net area with conversions from forests to forest plantations exceeds the forest area increase of the country/region, according to publically available data or information, such as provided by the FAO.</p>	Y	CFCC-2002:2022 -Appendix A: Table 2: List of indicators for significant risk at origin level e) ii



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
<b>f)</b> <i>Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not met.</i>	Y	CFCC-2002:2022) -Appendix A: Table 2: List of indicators for significant risk at origin level f) <i>f) Activities where the spirit of the ILO relevant Declarations is not met.</i> g) Substantiated studies demonstrate that the ILO Declaration related to the principles and rights at work is not respected in the country
i. Substantiated studies demonstrate that the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not respected in the country.	Y	CFCC-2002:2022) -Appendix A: Table 2: List of indicators for significant risk at origin level f) i Substantiated studies demonstrate that the ILO Declaration related to the principles and rights at work is not respected in the country
<b>g)</b> <i>Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met.</i>	Y	CFCC-2002:2022) -Appendix A: Table 2: List of indicators for significant risk at origin level g) <i>Activities where the spirit of the relevant United Nations Declaration is not met.</i>
i. Substantiated studies demonstrate that the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met in the country.	Y	CFCC-2002:2022) -Appendix A: Table 2: List of indicators for significant risk at origin level g) i Substantiated studies demonstrate that the spirit of the United Nations Declaration related to the rights of indigenous peoples is not met in the country
<b>h)</b> <i>Conflict timber.</i>	Y	CFCC-2002:2022 -Appendix A: Table 2: List of indicators for significant risk at origin level h)
i. The country / region has a prevalence of armed conflict according to publicly available data sources such as Fragile State List.	Y	CFCC-2002:2022 -Appendix A: Table 2: List of indicators for significant risk at origin level h) The country / region has a prevalence of armed conflict according to publicly available data sources such as internationally recognized list for fragile state
<b>i)</b> <i>Genetically modified trees.</i>	Y	CFCC-2002:2022) -Appendix A: Table 2: List of indicators for significant risk at origin level i)





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PEFC benchmark requirement	YES / NO*	Reference to system documentation
i. According to publicly available data genetically modified forest and tree based organisms are produced in the country/region and placed on the commercial market.	Y	CFCC-2002:2022-Appendix A: Table 2: List of indicators for significant risk at origin level i)i)
<b>Table 3: List of indicators for significant risk at supply chain level</b>		
<b>Indicators</b>		
a) Countries/regions where the products have been traded are unknown.	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources</b> Table 3: List of indicators for significant risk at supply chain level a)
b) Species in the product are unknown.	Y	CFCC-2002:2022-Appendix A Table 3: List of indicators for significant risk at supply chain level b)
c) Evidence of illegal practices concerning controversial sources by any company in the supply chain.	Y	CFCC-2002:2022-Appendix A: Table 3: List of indicators for significant risk at supply chain level c)

PEFC benchmark requirement	YES / NO*	Reference to system documentation
<b>3.7</b> The risk assessment shall be carried out for the first delivery of every individual supplier, or for several suppliers, with the same characteristics listed in 2.1 of this appendix, and the same applicability of indicators according to tables 1-3 above.  Note: Where deliveries from suppliers from the same region share the same characteristics listed in 2.1, and the same applicability of indicators according to tables 1-3, the risk assessment can be implemented as an assessment for a whole region.	Y	CFCC-2002:2022-Appendix A: 3.7
<b>3.8</b> For all material that is subject to the organisation's risk assessment, the organisation shall keep an updated list of characteristics listed in 2.1 of this appendix and indicators	Y	CFCC-2002:2022-Appendix A: 3.8



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
according to tables 1-3 for supplies of individual suppliers and suppliers that share the same characteristics.		
<b>3.9</b> The risk assessment shall be reviewed and if necessary revised at least annually, and when changes regarding the characteristics listed in 2.1 of this appendix occur.	Y	CFCC-2002:2022-Appendix A: 3.9
<b>4. Substantiated concerns</b>		
<b>4.1</b> The organisation shall ensure that substantiated concerns about the potential origin of material covered by the organisation's DDS in controversial sources are promptly investigated, starting no later than ten workdays as of identification of the substantiated concern.	Y	Chain of Custody Requirements (CFCC-2002:2022) -Appendix A: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources 4.1
<b>4.2</b> If the concern cannot be resolved by the organisation's investigation, the risk of the relevant material being from controversial sources shall be determined as "significant" and managed in accordance with clause 5 of this appendix	Y	CFCC-2002:2022) -Appendix A: 4.2
<b>5. Management of significant risk supplies</b>		
<b>5.1 General</b>		
<b>5.1.1</b> For supplies identified as having "significant risk", the organisation shall request the supplier to provide additional information and evidence that allows the organisation to classify the supply as having "negligible risk". The organisation shall request the supplier to:	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources 5.1.1</b>
a) Provide the organisation with necessary information to identify the forest area(s) of the raw material and the whole supply chain relating to the "significant risk" supply.	Y	CFCC-2002:2022) -Appendix A: 5.1.1 a)
b) Enable the organisation to carry out a second party or a third party inspection of the supplier's operation as well as operations of the previous suppliers in the chain.	Y	CFCC-2002:2022) -Appendix A 5.1.1 b)



PEFC benchmark requirement	YES / NO*	Reference to system documentation
Note: These procedures can be ensured e.g. by contractual agreements or a written self-declaration by the supplier.		
<b>5.1.2</b> The organisation shall establish a second or third party verification programme for supplies classified as “significant risk”. The verification programme shall cover:	Y	CFCC-2002:2022) -Appendix A: 5.1.2
a) identification of the whole supply chain and forest area(s) of the supply’s origin	Y	CFCC-2002:2022) -Appendix A: 5.1.2 a)
b) on-site inspection as appropriate	Y	CFCC-2002:2022) -Appendix A: 5.1.2 b)
c) corrective measures as required	Y	CFCC-2002:2022) -Appendix A: 5.1.2 c) 5
<b>5.2 Identification of the supply chain</b>	Y	CFCC-2002:2022) -Appendix A: 5.2.1
<b>5.2.1</b> The organisation shall require, from all suppliers of “significant risk” supplies, detailed information on the whole supply chain and forest area(s) of the supply’s origin.		
<b>5.2.2</b> In cases where the supplies can be verified as “negligible risk” according to the indicators in table 1 at one step in the supply chain the organisation is not required to track the whole supply chain to the forest area, except in case of substantiated concerns, which shall be addressed as outlined in appendix 1, clause 4.	Y	CFCC-2002:2022) -Appendix A: 5.2.2
<b>5.2.3</b> The information submitted shall allow the organisation to plan and execute on-site inspections.	Y	CFCC-2002:2022) -Appendix A: 5.2.3
<b>5.3 On-site inspections</b>	Y	CFCC-2002:2022) -Appendix A: 5.3.1
<b>5.3.1</b> The organisation’s verification programme shall include on-site inspections of suppliers delivering “significant risk” supplies. The on-site inspections can be carried out by the organisation itself (second party inspection) or by a third party on behalf of the organisation. The organisation may substitute		



PEFC benchmark requirement	YES / NO*	Reference to system documentation
the on-site inspection with documentation review where the documentation provides sufficient confidence in the material origin in non-controversial sources.		
<b>5.3.2</b> The organisation shall demonstrate that personnel carrying out inspections has sufficient knowledge and competence in the local business, cultural and social customs, and applicable treaties, conventions legislation, governance and law enforcement, relevant to the origin of “significant risk” supplies and to the risk(s) identified.	Y	CFCC-2002:2022) -Appendix A: 5.3.2
<b>5.3.3</b> The organisation shall determine a sample of “significant risk” supplies from the supplier to be verified by the verification programme. Identical deliveries by the same supplier shall be considered as a single supply. The size of the annual sample shall be at least the square root of the number of “significant” risk supplies per one year: ( $y=\sqrt{x}$ ), rounded up to the nearest whole number. Where the previous on-site inspections proved to be effective in fulfilling the objective of this document, the size of the sample may be reduced to $y=0.8 \sqrt{x}$ , rounded up to the next whole number.	Y	CFCC-2002:2022) -Appendix A: 5.3.3
<b>5.3.4</b> The on-site inspections shall cover:	Y	CFCC-2002:2022) -Appendix A: 5.3.4
a) The direct supplier and all previous suppliers in the supply chain in order to assess compliance with the supplier claims on the origin of the raw material.	Y	CFCC-2002:2022) -Appendix A: 5.3.4 a)
b) The forest owner / manager of the forest area of the supply origin, or any other party responsible for management activities on that forest area, in order to assess their compliance with legal requirements.	Y	CFCC-2002:2022) -Appendix A: 5.3.4 b)
<b>5.4 Corrective measures</b>	Y	CFCC-2002:2022) -Appendix A: 5.4.1
<b>5.4.1</b> The organisation shall define written procedures for implementing corrective measures for non- compliance for		



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
suppliers identified by the organisation's verification programme.		
<b>5.4.2</b> The range of corrective measures shall be based on the scale and seriousness of the risk that forest and tree based product(s) may be from controversial sources and shall include at least one or more of the following :	Y	CFCC-2002:2022) -Appendix A: 5.4.2
a) Clear communication of the risk identified with a request for addressing the risk identified within a specific timeline so as to ensure that forest and tree based product(s) from controversial sources is not supplied to the organisation.	Y	CFCC-2002:2022) -Appendix A: 5.4.2 a)
b) Requiring suppliers to define risk mitigation measures relating to compliance with legal requirements in the forest area(s) or efficiency of the information flow in the supply chain.	Y	CFCC-2002:2022) -Appendix A: 5.4.2 b)
c) Cancellation or suspension of any contract or order for forest and tree based product(s) until the supplier can demonstrate that appropriate risk mitigation measures have been implemented.	Y	CFCC-2002:2022) -Appendix A: 5.4.2 c) 6
<b>6. No placement on the market</b>		
<b>6.1</b> Forest and tree based material/products from unknown sources or from controversial sources shall not be included in a PEFC product group.	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix 1: PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources 6.1</b> 7 Forest and tree based material/products from unknown sources or from controversial sources shall not be included in a CFCC product group
<b>6.2</b> Where it is known to the organisation that forest and tree based materials/products not covered by the organisation's PEFC chain of custody originate in illegal sources (controversial sources, 3.7a), it shall not be placed on the market.	Y	CFCC-2002:2022 -Appendix A: 6.2 8 Where it is known to the organisation that forest and tree based materials/products not covered by the organisation's CFCC chain of custody originate in illegal sources (controversial sources, 3.7a), it shall not be placed on the market



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
<b>6.3</b> Where the organisation has received substantiated concerns that forest and tree based materials/products not covered by the organisation's PEFC chain of custody originate in illegal sources (controversial sources, 3.7a), it shall not be placed on the market until the concern has been resolved in accordance with clause 4 of this appendix.	Y	CFCC-2002:2022-Appendix A: 6.3

## Appendix 2: Implementation of the chain of custody standard by multi-site organisations

### Normative Appendix

PEFC benchmark requirement	YES / NO*	Reference to system documentation
<b>2. Eligibility criteria for the multi-site organisation</b>		
<b>2.1</b> The multi-site organisation is defined as an organisation having an identified central function (normally, and hereafter referred to as a “central office”) at which certain activities are planned, controlled and managed and a network of local offices or branches (sites) at which such activities are fully or partially carried out.	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix B: Implementation of the chain of custody standard by multi-site organisations 2.1</b>
<b>2.2</b> The multi-site organisation does not need to be a unique entity, but all sites shall have a legal or contractual link with the central office and be subject to a common chain of custody that is subject to continuous surveillance by the central office. This means that the central office has the right to implement corrective actions when needed at any site. Where applicable, this should be laid down in the contract between the central office and the sites.	Y	CFCC-2002:2022) -Appendix B: Implementation of the chain of custody standard by multi-site organisations 2.2
<b>2.3</b> The multi-site organisation may cover: a) Organisations operating with franchises or companies where the sites are linked through a common ownership, management or other organisational link. b) Groups of independent legal enterprises established and functioning for the purposes of the chain of custody certification (producer group).  Note: Membership in an association is not covered by the term “management or other organisational link”.	Y	CFCC-2002:202) -Appendix B: Implementation of the chain of custody standard by multi-site organisations 2.3
<b>2.4</b> A producer group is a network of typically small independent enterprises that have associated together for the	Y	CFCC-2002:2022-Appendix B: Implementation of the chain of custody standard by multi-site organisations 2.4



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
purpose of obtaining and maintaining chain of custody certification. The central office may be an appropriate trade association, or any other properly experienced legal entity that is either nominated for the purpose by a group of intending members or offers a group service managed for the purposes of and consistently with this standard. The central office can also be administered by one member of the group. Note: The central office in the case of the producer group can be called the “group entity” and sites can be called “group members”.		
<b>2.5</b> A site is a location at which activities relating to the organisation’s chain of custody are carried out.	Y	CFCC-2002:2022-Appendix B: Implementation of the chain of custody standard by multi-site organisations 2.5
<b>2.6</b> The producer group is limited to participation of sites that are domiciled in a single country and that: a) have no more than 50 employees (full-time employees equivalent), b) have a turnover of maximum of 10,000,000 EUR, or equivalent	Y	CFCC-2002:2022-Appendix B: Implementation of the chain of custody standard by multi-site organisations 2.6
<b>3. Requirements for multi-site organisations</b>		
<b>3.1 General</b> <b>3.1.1</b> The organisation’s chain of custody shall be centrally administered and be subject to central review. All the relevant sites (including the central administration function) shall be subject to the organisation’s internal audit programme and shall have been audited in accordance with that programme prior to the certification body starting its assessment.	Y	<b>Chain of Custody Requirements (CFCC-2002:2022) -Appendix B: Implementation of the chain of custody standard by multi-site organisations 3.1.1</b>
<b>3.1.2</b> It shall be demonstrated that the central office of the organisation has established a chain of custody in accordance with this standard and that the whole organisation	Y	CFCC-2002:2022-Appendix B: 3.1.2





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PEFC benchmark requirement	YES / NO*	Reference to system documentation
(including all the sites) meets the requirements of this standard.		
<b>3.1.3</b> The organisation shall be able to demonstrate its ability to collect and analyse data from all sites, including the central office authority and its ability to initiate changes in the chain of custody operating in the sites if required.	Y	CFCC-2002:2022) -Appendix B: 3.1.3
<b>3.2 Function and responsibilities of the central office</b> <b>3.2.1</b> The central office shall: a) Represent the multi-site organisation in the certification process, including communication and relationship with the certification body.	Y	CFCC-2002:2022) -Appendix B: 3.2.1 a)  3.2.1 The central office shall: a) Represent the multi-site organisation in the certification process, including communication and relationship with the certification body.
b) Submit an application for the certification and its scope, including a list of participating sites.	Y	CFCC-2002:2022-Appendix B: 3.2.1 b)
c) Ensure contractual relationship with the certification body.	Y	CFCC-2002:2022-Appendix B: 3.2.1 c)
d) Submit to the certification body a request for extension or reduction of the certification scope, including coverage of participating sites.	Y	CFCC-2002:2022-Appendix B: 3.2.1 d)
e) Provide a commitment on behalf of the whole organisation to establish and maintain a chain of custody in accordance with the requirements of this standard.	Y	CFCC-2002:2022) -Appendix B: 3.2.1 e)
f) Provide all the sites with information and guidance needed for effective implementation and maintenance of the chain of custody in accordance with this standard; The central office shall provide the sites with the following information or access to the following information: – A copy of this standard and any guidance relating to the implementation of the requirements of this standard.	Y	CFCC-2002:2022) -Appendix B: 3.2.1 f) .... - CFCC Label Use Rules and any guidance relating to their implementation



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
<ul style="list-style-type: none"> <li>– PEFC Trademarks Rules and any guidance relating to their implementation.</li> <li>– The central office's procedures for the management of the multi-site organisation.</li> <li>– Conditions of the contract with the certification body relating to the rights of the certification body or accreditation body to access the sites' documentation and installations for the purposes of evaluation and surveillance, and disclosure of information about the sites to a third party.</li> <li>– Explanation of the principle of the mutual responsibility of sites in the multi-site certification.</li> <li>– Results of the internal audit programme and the certification body's evaluation and surveillance and relating corrective and preventive measures applicable to individual sites.</li> <li>– The multi-site certificate and any of its parts relating to the scope of the certification and coverage of sites.</li> </ul> <p>Note: The term "mutual responsibility" means that nonconformities found in one site or the central office may result in corrective actions to be performed at all sites; an increase in internal audits or withdrawal of the multi-site certificate.</p>		
g) Provide organisational or contractual connection with all the sites, which shall include commitments by the sites to implement and maintain the chain of custody in accordance with this standard. The central office shall have a written contract or other written agreement with all the sites which covers	Y	CFCC-2002:2022) -Appendix B: 3.2.1 g)
h) Establish written procedures for the management of the multi-site organisation.	Y	CFCC-2002:2022-Appendix B: 3.2.1 h)
i) Keep records relating to the central office and sites compliance with the requirements of this standard.	Y	CFCC-2002:2022-Appendix B: 3.2.1 i)



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
j) Operate an internal audit programme as outlined in 3.2.2.	Y	CFCC-2002:2022-Appendix B: 3.2.1 j)
k) Operate a review of the central office and sites conformity, including review of results of the internal audits programme and certification body's evaluations and surveillance; shall establish corrective and preventive measures if required; and shall evaluate the effectiveness of corrective actions taken.	Y	CFCC-2002:2022-Appendix B: 3.2.1 k)
<b>3.2.2</b> Internal audit programme <b>3.2.2.1</b> The internal audit programme shall provide for:	Y	CFCC-2002:2022-Appendix B: 3.2.2.1
a) Audit of all the sites (including its own central administration function), on site or remotely, where a remote verification of the implementation of chain of custody processes is feasible, prior to the certification body starting its evaluation.	Y	CFCC-2002:2022-Appendix B: 3.2.2.1 a)
b) Audit of any new site prior to the certification body starting the process of the certification scope extension.	Y	CFCC-2002:2022-Appendix 2: 3.2.2.1 b)
<b>3.3 Function and responsibilities of sites</b> Sites connected to the multi-site organisation shall be responsible for:	Y	CFCC-2002:2022-Appendix B: 3.3
a) Implementation and maintenance of the chain of custody requirements in accordance with this standard.	Y	CFCC-2002:2022-Appendix B: 3.3 a)
b) Entering into a contractual relationship with the central office, including commitment on the compliance with the chain of custody requirements and other applicable certification requirements.	Y	CFCC-2002:2022-Appendix B: 3.3 a) i
c) Responding effectively to all requests from the central office or certification body for relevant data, documentation or other information whether in connection with formal audits or reviews or otherwise.	Y	CFCC-2002:2022-Appendix B: 3.3 a) ii



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PEFC benchmark requirement	YES / NO*	Reference to system documentation
d) Providing full co-operation and assistance in respect of the satisfactory completion of internal audits performed by the central office and audits performed by the certification body, including access to the sites installations.	Y	CFCC-2002:2022-Appendix B: 3.3 a) iii
e) Implementation of relevant corrective and preventive actions established by the central office	Y	CFCC-2002:2022) -Appendix B: 3.3 a) iv

## **PEFC Checklist – Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard (PEFC ST 2003:2020)**

### **1 Scope**

This checklist covers requirements for certification bodies operating certification against the PEFC 2002:2020 Chain of Custody standard as defined in PEFC ST 2003:2020. It shall be completed by any system that applies for endorsement and recognition of a system specific Chain of Custody standard (i.e., a national Chain of Custody standard), unless the system has adopted the PEFC ST 2003:2020. CFCS has a system specific COC standard.

### **2 CFCS Chain of custody certification**

CFCS has a scheme specific chain of custody standard (CFCC 2002:2020). Its requirements are almost identical to those of the international PEFC standard PEFC ST 2002:2020, with the major exception that all references to PEFC have been replaced with CFCC. CFCC claims that nationally approved standards shall not refer to international organisations that are not formally approved in China.

CFCC has directly adopted *PEFC ST 2003:2020* standard in response to the requirements of certification bodies carrying out COC certification. The Decision was made unanimously in the CFCC meeting on October 29, 2021. *The 18 participating committee members voted unanimously that:*

*CFCC equivalently adopt PEFC ST 2003:2020 standard. This standard will be implemented on Oct 30<sup>th</sup> 2021, with a transition period to Dec 30<sup>th</sup> 2021* (Unofficial translation of the meeting agenda 4 (日程4)).

**CFCC and the national accreditation organisation CNAS have adopted the PEFC ST 2003:2020 to the reference standard when assessing qualifications of certification bodies to operate chain of custody certification under CFCS. Thus, the detailed assessment on the compliance with PEFC ST 2003:2020 is not relevant.**

CFCS reference documents defining requirements for certification bodies doing chain of custody certification

CFCC 7 Meeting memo October 29, 2021	Adoption of PEFC ST 2003:2020 as a reference standard for certification bodies' requirements in COC certification
CFCC 2002:2022	Chain of Custody Requirements, January 13, 2022
PEFC 2003:2020	Requirements for Certification Bodies operating Certification against the PEFC International Chain of Custody Standard
CNAS S23:2021	<p>Accreditation Requirements for Forest certification Body.</p> <p>The revised accreditation requirements integrate the requirements of PEFC 2003:2020 into CNAS accreditation procedures according to the CNAS notification issued January 28, 2021.</p>

## Annex 2

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### **Stakeholder Involvement Survey Form**



**Indufor Oy**  
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Shanghai, China

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